

SUIT NO. 1019582 CARMOUCHE, JOHN H UNASSIGNED, UNASSIGNED
 PARISH OF CAMERON ET AL 17405 PERKINS RD
 VS BATON ROUGE, LA 70810
 AUSTER OIL AND GAS INC ET AL TALBOT CARMOUCHE & MARCELLO UNASSIGNED

DIVISION: TYPE: DATE FILED: 02/04/2016 DATE AS OF: 05/22/2018 SUIT STATUS: OPN

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COUNT	DATE	PCODE	DESCRIPTION	PARTY	COSTS	RUNNING COSTS	DEPOSITS	PAYEE	PAID_DATE	REFERENCE #
1	02/04/2016	000068	ADM-NEW SUIT	P 1	-22.00	-22.00		000001	02/12/2016	22657
2	02/04/2016	005600	JUDICIAL EXPENSE FUND	P 1	-15.00	-37.00		005600	02/26/2016	22690
3	02/04/2016	000201	JUDGES' SUPPLEMENTAL COMP FUND	P 1	-24.00	-61.00		000201	02/26/2016	22687
4	02/04/2016	005605	SUPREME COURT ACT 405	P 1	-0.50	-61.50		027832	02/26/2016	22694
5	02/04/2016	005316	SUPREME COURT OF LOUISIANA	P 1	-5.00	-66.50		005316	02/26/2016	22689
6	02/04/2016	000516	CASE PROCESSING FEES/CASE	P 1	-5.00	-71.50		000001	02/12/2016	22657
7	02/04/2016	000001	FR PET;CC;WITH HOLD CITATIONS	P 1	-270.00	-341.50		000001	02/26/2016	22682
8	02/04/2016	000001	FR SUPREME COURT REPORTING FORM	P 1	-6.00	-347.50		000001	02/12/2016	22657
9	02/05/2016	000000	DEPOSIT - TALBOT CARMOUCHE	P 1		-347.50	250.00	000000	02/05/2016	14411
10	02/22/2016	000000	DEPOSIT - TALBOT CARMOUCHE	P 1		-347.50	97.50	000000	02/22/2016	14451
11	03/14/2016	000001	FR PET OF INTERVENTION/NO SERVICE	P 2	-29.00	-376.50		000001	/ /	
12	03/28/2016	000001	FR RULE TO SHOW CAUSE	P 2	-13.00	-389.50		000001	/ /	
13	03/28/2016	000016	RULE FIXED FOR 04-25-16 @ 10	P 2	0.00	-389.50		000001	/ /	
14	03/31/2016	000001	FR ORDER	P 2	-13.00	-402.50		000001	/ /	
15	04/13/2016	000001	FR PET OF INTERVENTION/HOLD SERVICE	P 3	-45.00	-447.50		000001	/ /	
16	04/21/2016	000055	ISSUE CITATION-26	P 1	-520.00	-967.50		000001	05/16/2016	22793
17	04/22/2016	000001	FR NOTICE OF REMOVAL/FAX	D 18	-173.00	-1140.50		000001	05/02/2016	22771
18	04/25/2016	000000	DEPOSIT - LISKOW & LEWIS	D 18		-1140.50	173.00	000000	04/25/2016	97513
19	05/09/2016	000000	DEPOSIT - TALBOT CARMOUCHE	P 1		-1140.50	520.00	000000	05/09/2016	14685
20	06/13/2016	000000	DEPOSIT - JONES WALKER	D 2		-1140.50	33.00	000000	06/13/2016	6238578
21	06/13/2016	000001	FR SUPPLEMENTAL NOTICE OF REMOVAL	D 2	-29.00	-1169.50		000001	06/15/2016	22833
22	05/11/2018	000000	DEPOSIT - TALBOT CARMOUCHE	P 1		-1169.50	335.00	000000	05/11/2018	16843
23	05/11/2018	000049	REQUEST FOR WRITTEN NOTICE/TRIAL	P 1	-29.00	-1198.50		000001	05/15/2018	23980
24	05/11/2018	000001	FR LETTER TO ISS ORIG PET/4	P 1	-93.00	-1291.50		000001	05/15/2018	23980
25	05/14/2018	000001	FR US DIST COURT DOCKET SHEET	D 18	-134.00	-1425.50		000001	/ /	
26	05/14/2018	000028	FRC JUDGMENT	D 18	-6.00	-1431.50		000001	/ /	
27	05/15/2018	008000	POSTAGE (ACT 243)	P 1	-13.24	-1444.74		000001	/ /	
28	05/17/2018	000049	REQUEST FOR WRITTEN NOTICE/TRIAL	D 22	-15.00	-1459.74		000001	/ /	
29	05/17/2018	000001	FAX CHARGES	D 22	-32.00	-1491.74		000001	/ /	
30	05/18/2018	000000	DEPOSIT - GUGLIELMO LOPEZ	D 27		-1491.74	50.00	000000	/ /	055370
31	05/18/2018	000049	REQUEST FOR WRITTEN NOTICE/TRIAL	D 27	-36.00	-1527.74		000001	/ /	
32	05/21/2018	000000	DEPOSIT - KEAN MILLER LLP	D 14		-1527.74	25.00	000000	/ /	301946
33	05/21/2018	000000	DEPOSIT - WALL BULLINGTON & COOK LLC	D 22		-1527.74	47.00	000000	/ /	6987

LEDGER BALANCE		CASH BALANCE	
Deposits	1530.50	Deposits	1408.50
PrePaid Deposits	0.00	PrePaid Deposits	0.00
Total Deposits	1530.50	Total Deposits	1408.50
Costs	-1527.74	Costs	-1191.50
PrePaid Costs	0.00	PrePaid Costs	0.00
Total Costs	-1527.74	Total Costs	-1191.50
Refunds	0.00	Refunds	0.00
Ledger Balance	2.76	Cash Balance	217.00
Escrows	0.00	Escrows	0.00

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY SR. & ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPOLP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

FILED: _____

DEPUTY CLERK

RECEIVED
2016 FEB 22 PM
CLERK OF THE
PARISH OF CAMERON

**PETITION FOR DAMAGES
TO THE
CAMERON PARISH COASTAL ZONE**

NOW INTO COURT come plaintiffs, through undersigned counsel, to allege the following:

PARTIES PLAINTIFF AND DEFENDANT

1.

The Plaintiffs are: (1) the PARISH OF CAMERON, and (2) the State of Louisiana *ex rel.* PARISH OF CAMERON. The Parish of Cameron is a local government of this State that has been authorized since 1983 to operate an approved Local Coastal Zone Management Program pursuant to La. R.S. 214.28. As shown more fully below, the Parish of Cameron is authorized by state statute to bring appropriate actions on its own behalf and in the name of the State of Louisiana for enforcement of the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 214.21, *et seq.*, hereinafter, the "CZM Act of 1978"), and the applicable

regulations, rules, orders and ordinances promulgated or adopted thereunder by the State or Cameron Parish, as amended (hereinafter, collectively and together with the CZM Act of 1978, the "CZM Laws").

2.

Made defendants herein are the following entities (hereinafter, collectively, "Defendants"):

AUSTER OIL AND GAS, INC. is domestic corporation whose registered agent, John A. Hogan, is located at 2036 Olene Drive, Sulphur, Louisiana 70663. Auster Oil and Gas, Inc. is named as successor to **R-5, Inc.**

APACHE OIL CORPORATION is a foreign corporation whose registered agent, C T Corporation System, is located at 350 N. St. Paul Street, STE. 2900, Dallas, TX. Apache Oil Corporation is named as successor in interest to **Apache Corporation**.

BP AMERICA PRODUCTION COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808. BP America Production Company is named in its own capacity and as successor to **Amoco Production Company, Pan American Petroleum Company, Pan American Production Company, Stanolind Oil & Gas Company, Vastar Resources and Yount-Lee Oil Company**.

CHEVRON PIPE LINE COMPANY is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron Pipe Line Company is named as successor in interest to **Gulf Refining Company**.

CHEVRON U.S.A. HOLDINGS INC. is a foreign corporation whose registered agent, Angie Wang c/o ChevronTexaco, is located at P.O. Box 6028, San Ramon, CA 94583. Chevron U.S.A. Holdings, Inc. is named as successor to **Texaco E&P, Inc. and Texaco, Inc.**

CHEVRON U.S.A. INC. is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron U.S.A., Inc. is named in its own capacity and as successor to **Chevron Oil Company**, **Gulf Oil Corporation** and **The California Company**.

DARSEY OPERATING CORPORATION is a domestic corporation whose registered agent, William G. Darsey, III, is located at 120 Rue Beauregard, Suite 100, Lafayette, LA 70505.

ENERVEST OPERATING, L.L.C. is a foreign company whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808.

EXXON MOBIL CORPORATION is a foreign corporation whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802. Exxon Mobil Corporation is named as successor to **The Superior Oil Company**.

FREEPOR T SULPHUR COMPANY is a foreign corporation whose principal place of business is located in New Orleans, Louisiana, and whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802.

GULFPORT ENERGY CORPORATION is a foreign corporation whose registered agent, David L. Patron, is located at c/o Phelps Dunbar LLP, 365 Canal Street, Suite 2000, New Orleans, Louisiana 70130-6534. Gulfport Energy Corporation is named in its own capacity and as successor to **Southern Petroleum Company** and **WRT Energy Corporation**.

HILCORP ENERGY COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808.

HONEYWELL INTERNATIONAL INC. is a foreign corporation whose registered agent, Corporation Service Company, is located at 320 Somerulos Street, Baton Rouge, Louisiana 70802. Honeywell International, Inc. is named as successor to **The Union Sulphur Company** and **Union Oil & Gas Corporation of Louisiana**.

KERR-MCGEE OIL AND GAS ONSHORE LP is a foreign limited partnership whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B,

Baton Rouge, Louisiana 70808. Kerr-McGee Oil and Gas Onshore LP is named as successor to **Sun Exploration & Production Co.**

RESOURCE SECURITIES CORPORATION is a domestic corporation whose registered agent, Wayne Hyman, is located at 124 Oak Coulee Drive, Lafayette, Louisiana 70507.

SAMUEL GARY JR. & ASSOCIATES, INC. is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

SHELL OFFSHORE INC. is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808.

SHELL OIL COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808.

STAR ENERGY, INC. is a domestic corporation whose registered agent, W. Miguel Swanwick, is located at 121 River Drive, Lafayette, Louisiana 70503.

SWEPI LP is a foreign partnership whose registered agent, C T Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808. SWEPI LP is named as successor to **Shell Western E&P Inc.**

TAYLOR ENERGY COMPANY LLC is a domestic limited liability company whose member, Phyllis M. Taylor, is domiciled in New Orleans, Louisiana, and whose registered agent, Paul J. Goodwine, is located at c/o Looper Goodwine & Ballew, 601 Poydras Street, Suite 2200, New Orleans, Louisiana 70130. Taylor Energy Company LLC is named as successor to **Taylor Energy Company**.

TEXAS PACIFIC OIL COMPANY, INC. is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

TEXAS PETROLEUM INVESTMENT COMPANY is a foreign corporation whose registered agent, Patrick S. Ottinger, is located at 1313 W. Pinhook Rd., Lafayette, LA 70503.

THE TEXAS COMPANY is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802.

TRANSCONTINENTAL OIL CORPORATION is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

VERNON E. FAULCONER, INC. is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, LA 70808.

AREAL EXTENT OF COMPLAINED-OF OPERATIONS

3.

In general, Plaintiffs allege below that certain of Defendants' oil and gas exploration, production and transportation operations associated with the development of the East Hackberry and West Hackberry Oil & Gas Fields in Cameron Parish were conducted in violation of the CZM Laws and that these activities caused substantial damage to land and waterbodies located in the "Coastal Zone" (hereinafter so called), as defined by the CZM Act of 1978, within Cameron Parish. A map of the entire Louisiana Coastal Zone is attached hereto as Exhibit A.

In the detailed allegations that follow, the term "Operational Area" (hereinafter so called) is used to describe the geographic extent of the area within which the complained-of operations and activities occurred. On information and belief, the areal extent of the Operational Area is identified on the maps contained in Exhibit B attached hereto.

JURISDICTION, VENUE, AND STATUTORY AND REGULATORY FRAMEWORK

4.

The CZM Act of 1978 states that it is the public policy of the state “[t]o protect, develop, and where feasible, restore or enhance the resources of the state’s coastal zone.” La. R.S. 49:214.22(1).

5.

Louisiana’s Coastal Zone is specifically defined in La. R.S. 49:214.24(5). *See Exhibit A.* The Coastal Zone includes “the coastal waters and adjacent shorelands within the boundaries of the coastal zone” The term “coastal waters” includes “bays, lakes, inlets, estuaries, rivers, bayous, and other bodies of water within the boundaries of the coastal zone which have measurable seawater content (under normal weather conditions over a period of years).” La. R.S. 49:214.23(4).

6.

The Operational Area is located in Cameron Parish and within the Coastal Zone, and therefore certain activities within the Operational Area are governed by the CZM Laws.

7.

The CZM Laws regulate certain “uses” within the Coastal Zone. La. R.S. 49:214.30 states that “[n]o person shall commence a use of state or local concern without first applying for and receiving a coastal use permit.” A map of the coastal use permits known to have been issued for work within the Operational Area is attached hereto as *Exhibit C*. A list of those coastal use permits is attached hereto as *Exhibit D*. The term “use” is defined at La. R.S. 49:214.23(13) as “any use or activity within the coastal zone which has a direct and significant impact on coastal waters.” “Uses of state concern” are defined as:

“Those uses which directly and significantly affect coastal waters and which are in need of coastal management and which have impacts of greater than local significance or which significantly affect interests of regional, state, or national concern. Use of state concern shall include, but not be limited to:

(a) Any dredge or fill activity which intersects with more than one water body.

(b) Projects involving use of state owned lands or water bottoms.

* * *

(f) All mineral activities, including exploration for, and production of oil, gas, and other minerals, all dredge and fill uses associated therewith, and all other associated uses.

(g) All pipelines for the gathering, transportation or transmission of oil, gas and other minerals.

(h) Energy facility siting and development."

(La. R.S. 49:214.25(A)(1)).

8.

"Uses of local concern" are defined as:

"Those uses which directly and significantly affect coastal waters and are in need of coastal management but are not uses of state concern and which should be regulated primarily at the local level if the local government has an approved program. Uses of local concern shall include, but not be limited to:

(a) Privately funded projects which are not uses of state concern.

* * *

(c) Maintenance of uses of local concern.

* * *

(e) Dredge or fill projects not intersecting more than one water body.

* * *

(i) Maintenance dredging.

* * *

(k) Uses on cheniers, salt domes, or similar land forms."

(La. R.S. 49:214.25(A)(2)).

9.

Enforcement of the CZM Laws is within the authority, *inter alia*, of an appropriate district attorney or a local government with an approved program. La. R.S. 49:214.36D. The Parish of Cameron, having obtained approval of its Coastal Zone Management Program from the

Secretary of the Louisiana Department of Natural Resources (hereinafter, the “LDNR”) on January 4, 1985 is a “local government with an approved program” within the meaning of the CZM Laws. *See La. R.S. 49:214.23(8) and La. R.S. 49:214.28.*

10.

Paragraph D of La. R.S. 49:214.36 states that “[t]he secretary [of the LDNR], the attorney general, an appropriate district attorney, or a local government with an approved program may bring such injunctive, declaratory, or other actions as are necessary to ensure that no uses are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit.” Accordingly, the Parish of Cameron is authorized under the provisions of La. R.S. 49:214.36 to bring appropriate actions in its own behalf and in the name of the State of Louisiana for enforcement of the CZM Laws within Cameron Parish. Plaintiffs are empowered to bring declaratory, civil damages, or other actions as are necessary to ensure that no uses of state or local concern “are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit.” La. R.S. 49:214.36(D); La. R.S. 16:2D.

11.

Paragraph E of La. R.S. 49:214.36 states that “[a] court may impose civil liability and assess damages; order, where feasible and practical, the payment of the restoration costs; require, where feasible and practical, actual restoration of areas disturbed; or otherwise impose reasonable and proper sanctions for uses conducted within the coastal zone without a coastal use permit where a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit. The court in its discretion may award costs and reasonable attorney’s fees to the prevailing party.”

12.

Paragraph G of La. R.S. 49:214.36 states that “[a]ny action pursuant to this Section... must be brought in any parish in which the use or activity is situated.”

13.

Venue for this action in this district is proper under La. R.S. 49:214.36(G). Plaintiffs are the proper parties to bring the causes of action set forth herein pursuant to La. R.S. 49:214.36(D).

14.

Defendants have engaged in uses of state and local concern in Cameron Parish within the Operational Area in violation of La. R.S. 49:214.21, *et seq.*

15.

The Louisiana CZM Laws require the secretary of the LDNR to develop a coastal management program and guidelines to further the policies and goals of La. R.S. 49:214.21, *et seq.* The adopted guidelines shall be followed in the development of the state program and local programs and shall serve as criteria for the granting, conditioning, denying, or modifying of coastal use permits. One of the goals of the guidelines is the “careful consideration of the impacts of uses on water flow, circulation, quantity, and quality and require that the discharge or release of any pollutant or toxic material into the water or air of the coastal zone be within all applicable limits established by law, or by federal, state, or local regulatory authority.” La. R.S. 49:214.27(3).

16.

The state coastal management regulations contemplated by La. R.S. 49:214.21, *et seq.*, are codified at LAC 43:I.700, *et seq.* These state regulations provide that coastal use permits required by La. R.S. 214.30 are *in addition to* “any other permit or approval required or established pursuant to any other constitutional provision or statute.” LAC 43:I.700. These state regulations further provide that “[m]ineral and production sites shall be cleared, revegetated, detoxified, and otherwise restored as near as practicable to their original condition upon termination of operations to the maximum extent practicable.” LAC 43:I.719.M. As discussed below, Defendants have failed to clear, revegetate, detoxify, and restore the mineral and production sites and other areas affected by their operations and activities within the Operational Area to their original condition, as required by LAC 43:I.719.M. Defendants are liable to

Plaintiffs under the CZM Laws for all damages associated with their failure to adhere to LAC 43:I.719.M.

17.

The coastal zone regulations further require that “[d]rilling and production sites shall be prepared, constructed, and operated using the best practical techniques to prevent the release of pollutants or toxic substances into the environment.” LAC 43:I.719.F. These regulations also require that:

- “[t]he location and operation of waste storage, treatment, and disposal facilities shall be avoided in wetlands to the maximum extent practicable, and best practical techniques shall be used to minimize adverse impacts which may result from such use.” LAC 43:I.715.A
- “[w]aste facilities located in wetlands shall be designed and built to withstand all expectable adverse conditions without releasing pollutants.” LAC 43:I.715.C.
- “[w]aste facilities shall be designed and constructed using best practical techniques to prevent leaching, control leachate production, and prevent the movement of leachate away from the facility.” LAC 43:I.715.D.
- “[a]ll waste disposal sites shall be marked and, to the maximum extent practicable, all components of waste shall be identified.” LAC 43:I.715.F.
- “[w]aste facilities in wetlands with identifiable pollution problems that are not feasible and practical to correct shall be closed and either removed or sealed, and shall be properly revegetated using the best practical techniques.” LAC 43:I.715.G.
- “[w]aste shall be disposed of only at approved disposal sites.” LAC 43:I.715.H.
- “[r]adioactive wastes shall not be temporarily or permanently disposed of in the coastal zone.” LAC 43:I.715.I.

As alleged below, the operations and activities of Defendants within the Operational Area have resulted in the release of contaminants, pollutants, waste, leachate, and toxic substances into the environment and away from the operated facilities, all in violation of LAC 43:I.715.A through I and LAC 43:I.719.F. Furthermore, the drilling and production sites and waste facilities of Defendants within the Operational Area were not built to withstand all expectable adverse conditions without releasing pollutants, were not prepared using best practical techniques to prevent the release of pollutants or toxic substances, and were not designed and constructed to

prevent leaching, control leachate production, or prevent the movement of leachate away from the facility. Defendants are liable for all damages resulting from their violation of the CZM Laws.

18.

Finally, the state coastal zone regulations prohibit the temporary or permanent disposal of radioactive wastes in the coastal zone. LAC 43:I.715.I. The operations and activities of Defendants in the Operational Area have resulted in the disposal of radioactive materials, including radium 226, radium 228, and naturally occurring radioactive materials (NORM), for which Defendants are liable.

FACTUAL ALLEGATIONS

19.

Defendants drilled and/or operated numerous oil and gas wells within the Operational Area. A map showing the oil and gas wells within the Operational Area is attached hereto as Exhibit E. A list of the oil and gas wells drilled and/or operated by each Defendant is attached hereto as Exhibit F. The operations and activities of Defendants alleged in this petition to be in violation of the CZM Laws were conducted (or are being conducted) to enable or support the drilling and operation of the oil and gas wells listed on Exhibit F.

20.

The oil and gas operations and activities of Defendants in the Operational Area included the construction and use of unlined earthen waste pits, which are simply holes, ponds, or excavations dug into the ground or marsh. Many of these waste pits have never been closed or have not been closed in conformance with the state and local CZM Laws and other applicable state environmental laws and regulations, including Statewide Order 29-B and the Louisiana Risk Evaluation/Corrective Action Program (RECAP).

21.

The use of waste pits in the Operational Area has a direct and significant impact on state coastal waters located within Cameron Parish, and thus each such pit required a coastal use permit after the enactment of the CZM Act of 1978. To the extent that, contrary to Plaintiffs' allegations, the use of any such waste pit was legally commenced prior to the enactment of the CZM Act of 1978, the continued existence of such waste pit following cessation of the operations supported by it constituted a new use for which a coastal use permit was required. In addition, the closure of any individual waste pits in the Operational Area would have involved substantial movement of materials and substantial alteration of the native terrain, and likewise required a state and/or local coastal use permit. On information and belief, Defendants never obtained the required state and/or local coastal use permits for the closure and/or post-CZM operations of their waste pits in the Operational Area. Additionally, these waste pits and areas adjacent thereto have never been cleared, revegetated, detoxified, and/or otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to design and construct their waste pits located in the Operational Area using best practical techniques to prevent leaching and to prevent the movement of leachate away from their waste facilities, as required by LAC 43:I.715.D.

22.

The Defendants use of waste pits in the Operational Area, and their failures to properly close those waste pits, to clear, revegetate, detoxify, and return the property affected thereby to its original condition, and to properly design those waste pits have caused ever increasing damage to the Cameron Parish Coastal Zone, for which Defendants are liable under the CZM Laws.

23.

Defendants have also discharged or disposed of oil field wastes from their waste pits and/or from their other oil and gas operations directly into the Operational Area. Each incident involving the discharge of oil field waste, including, without limitation, oil field brines, has a direct and significant impact on state coastal waters located in Cameron Parish and constitutes a

use for which a state and/or local coastal use permit was required after the enactment of CZM Act of 1978 (Acts 1978, No. 361). On information and belief, Defendants never obtained the required state and/or coastal use permits for the discharge of oil field wastes into the Operational Area. Additionally, the areas of the Cameron Parish Coastal Zone that have received such discharges have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F, and failed to design and construct their waste pits in a manner to prevent leaching and the resulting discharge wastes, as required by LAC 43:I.715.D. Finally, Defendants knew or should have known that their oilfield wastes contain unacceptable and inherently dangerous levels of radioactive materials, including Radium 226 and 228, and thus the discharge of such materials into the Operational Area after 1978 was a flagrant violation of the CZM Laws, particularly LAC 43:I.715.I. As a result of these failures, Defendants are liable under the CZM Laws for damages and the other relief sought herein.

24.

In addition to the use of unpermitted waste pits, the failure to close waste pits properly, and the unpermitted discharge of oil field waste, including, without limitation, oilfield brines, in the Operational Area, Defendants' oil and gas activities have caused the Cameron Parish Coastal Zone, and in particular the canals, bayous, sediments, marshes, soils, and groundwaters in the Operational Area, to become contaminated or polluted in excess of applicable state standards, which has a direct and significant impact on state coastal waters. Each of these uses constitutes a use for which a coastal use permit was required beginning with the enactment of the CZM Act of 1978. The state coastal zone regulations, at LAC 43.I.700, *et seq.*, define "contaminant" as "an element causing pollution of the environment that would have detrimental effects on air or water quality or on native floral or faunal species." The contamination deposited in the Operational Area as a result of Defendants' activities has had a detrimental effect on the quality of the receiving state waters, on plant and animal life, and on humans who are exposed to such contamination. In addition, Defendants have utilized the Operational Area for the storage of

their pollution or contamination, which likewise is a use for which a state and/or local coastal use permit has been required since 1978. On information and belief, Defendants never obtained the required state and/or local coastal use permits for the deposition or storage of contamination or pollution in the Operational Area. The areas of the Cameron Parish Coastal Zone that have been affected by such pollution or contamination have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F. Defendants have also allowed the accumulation of radioactive materials in the soils and groundwaters of the Operational Area, in violation of LAC 43:I.715.I. Defendants are thus liable for their acts of contamination in violation of the CZM Laws, including La. R.S. 49:214.36.

25.

Since 1978 and before, Defendants' oil and gas activities have resulted in the dredging of numerous canals in, through, and across the Operational Area. The dredging of canals in the Operational Area has a direct and significant impact on the state coastal waters within Cameron Parish. On information and belief, Defendants in some instances exceeded the limits of the coastal use permits issued in connection with the dredging of such canals, and in other instances failed to obtain the coastal use permits required for the dredging of such canals. Furthermore, Defendants failed to design, construct and maintain said canals using the best practical techniques to prevent bank slumping, erosion and saltwater intrusion and to minimize the potential for inland movement of storm-generated surges in accordance with LAC 43:I.705.J. As a consequence thereof, Defendants' dredging activities have resulted in the degradation of the Operational Area, including the erosion of marshes and the degradation of terrestrial and aquatic life therein. Additionally, the destruction of the Cameron Parish Coastal Zone has increased the risk of damage from storm-generated surges and other flooding damage, and has enabled and/or accelerated saltwater intrusion. Furthermore, Defendants failed to revegetate, refill, clean, detoxify, and otherwise restore these canals to their original condition as required by LAC 43:I.705.N, 711.F and 719.M.

26.

The above activities of Defendants lie in stark contrast to, and in violation of, the policies enumerated at LAC 43:I.701(G), which states as follows:

"It is the policy of the coastal resources program to avoid the following adverse impacts . . . :

(4) alterations in the natural concentration of oxygen in coastal waters;

(5) destruction or adverse alterations of streams, wetland, tidal passes, inshore waters and waterbottoms, beaches, dunes, barrier islands, and other natural biologically valuable areas or protective coastal features;

* * *

(8) detrimental changes in existing salinity regimes;

(9) detrimental changes in littoral and sediment transport processes;

* * *

(13) discharges of pathogens or toxic substances into coastal waters;

* * *

(16) adverse alteration or destruction of unique or valuable habitats, critical habitat for endangered species, important wildlife or fishery breeding or nursery areas, designated wildlife management or sanctuary areas, or forestlands;

* * *

(18) adverse disruptions of coastal wildlife and fishery migratory patterns;

(19) land loss, erosion, and subsidence;

(20) increases in the potential for flood, hurricane and other storm damage, or increase in the likelihood that damage will occur from such hazards;

(21) reduction in the long term biological productivity of the coastal ecosystem.

27.

On information and belief, at least some of the activities of Defendants described above may have been permitted and/or authorized by the Louisiana Department of Natural Resources, Office of Conservation (hereinafter, the "LDNR-OC"). Paragraph B of La. R.S. 49:214.31

states that “[p]ermits issued pursuant to existing statutory authority of the office of conservation in the Department of Natural Resources for the location, drilling, exploration and production of oil, gas, sulfur or other minerals shall be issued in lieu of coastal use permits, provided that the office of conservation shall coordinate such permitting actions pursuant to R.S. 49:214.31(B) and (D) and shall ensure that all activities so permitted are consistent with the guidelines, the state program and any affected local program.” (Emphasis added). The *Memorandum of Understanding Between the Coastal Management Section of the Department of Natural Resources and the Office of Conservation of the Department of Natural Resources*, dated July 8, 1980, reinforces section La. R.S. 49:214.31, wherein it states that the LDNR-OC “will issue in-lieu permits only if the proposed activity is consistent with the Coastal Use Guidelines, the Louisiana Coastal Resources Program and affected approved local programs.”

28.

To the extent that Defendants operated or conducted activities in the Operational Area under “in lieu” permits authorized or granted by the LDNR-OC or another state agency, Defendants were obligated to comply fully with the CZM Laws in the conduct of such operations or activities.

29.

Furthermore, Plaintiffs allege that most, if not all, of Defendants’ operations or activities complained of herein were not “lawfully commenced or established” prior to the implementation of the coastal zone management program. *See LAC 43:723(B)(8)*. The complained-of operations and activities were prohibited prior to 1978 by various provisions of Louisiana Statewide Orders 29, 29-A, and 29-B, various field wide orders, as well as various orders of the Louisiana Stream Control Commission.

30.

Defendants are required to comply not only with all applicable state environmental laws and state regulations, but also with any additional requirements imposed by the State of Louisiana or Cameron Parish through the coastal zone management program. Defendants have

failed to comply with numerous provisions of the state coastal zone management program, as previously alleged, and thus they are liable under the CZM Laws for any damages resulting from these violations.

31.

The Defendants are liable for the foregoing violations of the state and local CZM Laws, including without limitation, the failure to clear, revegetate, detoxify, and restore to their original condition those portions of the Cameron Parish Coastal Zone affected by Defendants' activities within the Operational Area.

32.

The damages, costs, and attorney fees provided by La. R.S. 49:214.36 are in addition to any fine, forfeiture, other penalty, or costs imposed under any other provision of law.

33.

Notwithstanding any allegations or language to the contrary contained elsewhere in this petition, Plaintiffs expressly limit the scope of the claims and allegations of this petition as follows:

- (a) Plaintiffs allege only those state law causes of action that they have a right to pursue under La. R.S. 49:214.21, *et seq.*, as amended, and the state and local regulations, guidelines, ordinances and orders promulgated pursuant thereto and consistent therewith;
- (b) Plaintiffs have not pled, and will never at any time in the future plead, any claim or cause of action arising under federal law or federal regulations, and assert no such claims herein; Plaintiffs allege no claims subject to federal question jurisdiction; Plaintiffs do not pursue or allege any claims or causes of action arising under federal common law;
- (c) To the extent any state law claims alleged in this petition are preempted by federal law , such claims are not alleged herein;

- (d) Plaintiffs do not pursue or allege any claims that have been discharged in bankruptcy;
- (e) Plaintiffs do not pursue or allege any claims "arising under the Constitution, laws, or treaties of the United States";
- (f) Plaintiffs do not allege or pursue any claims wherein their right to relief under any cause of action necessarily depends on a resolution of a substantial, disputed question of federal law;
- (g) Plaintiffs do not allege or pursue any claims arising under the Rivers and Harbors Act of 1899, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the "RHA"), and do not pursue or allege any claims arising under any U.S. Army Corps of Engineers regulations or permits;
- (h) Plaintiffs do not pursue or allege any claims arising under the Clean Water Act of 1972, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the "CWA");
- (i) Plaintiffs do not pursue or allege any claims arising under any federal regulations;
- (j) Plaintiffs do not allege or pursue any claim that any Defendant violated a federal permit or failed to obtain a federal permit;
- (k) Plaintiffs do not allege that they are third party beneficiaries of any obligation between Defendants and any governmental body, or that they are third party beneficiaries of any permitting scheme;
- (l) Plaintiffs do not allege that they are third party beneficiaries of any permit, contract, or right of way agreement, or other conventional servitude or servitude imposed by law;
- (m) Plaintiffs do not allege that they have the right to enforce a federal permit as a third party beneficiary;

(n) Plaintiffs do not allege that they represent any class; further, Plaintiffs do not pursue or allege any claim over which there is CAFA jurisdiction of this case; Plaintiffs bring this action only on their own behalf and not on behalf of any class or group of individuals or legal entities.

(o) Plaintiffs do not allege that any acts, omissions, operations or activities occurring on the Outer Continental Shelf violated the CZM Laws. None of the acts, omissions, operations or activities that form the basis of the Plaintiffs' claims in this petition involve operations or activities on the Outer Continental Shelf. Plaintiffs do not pursue or allege any claim arising under the Outer Continental Shelf Lands Act (the "OCSLA") (43 U.S.C. § 1331 *et seq.*); Plaintiffs do not pursue or allege any claim subject to the jurisdiction of the OCSLA; further, Plaintiffs do no pursue or allege any claim within the jurisdiction established by 43 U.S.C. § 1349;

(p) Plaintiffs do not pursue or allege any claim for activities conducted on a federal enclave or for damage to a federal enclave, and do not pursue or allege any claims regarding any land held in trust by the federal government, its officers, agencies, or agents; Plaintiffs do not pursue or allege any claims over which the federal government contests title. Plaintiffs do not pursue or allege any claims for damages to any federal floodwalls, federal levees, or any other federal installations or properties. Plaintiffs do not allege that any event, activity, or claim pursued in this petition occurred on a federal enclave. Plaintiffs do not allege or pursue any claim for an alleged injury in circumstances where the alleged injury arose on a federal enclave and the injury is indivisible from an injury that did not occur on a federal enclave.

(q) Plaintiffs make no claims under Louisiana tort law, contract law, mineral law, or property law;

(r) Plaintiffs do not allege or pursue any claims that are: (1) covered by or subject to the jurisdiction of the All Writs Act, 28 U.S.C. §1651, et seq., as amended; or, (2) covered by or subject to the jurisdiction of the Convention on the Recognition of Foreign Arbitral Awards,

9 U.S.C. §201, et seq., as amended. Plaintiffs do not allege or pursue any claims under the federal Oil Pollution Act of 1990, as amended;

(s) Plaintiffs do not allege any claim or cause of action arising under the federal Natural Gas Act, 15 U.S.C. 717 – 717w.

(t) In summary, Plaintiffs limit the claims asserted in this petition to state law claims arising under the CZM Laws. The attachment of the map of the entire Louisiana Coastal Zone (See Exhibit A) or the attachment of any other exhibits to this petition shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. With regard to any permit alleged in this petition to have been violated, the inclusion of language in such permit referring to federal laws or federal regulations shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. Any allegation in this petition that any defendant has violated a coastal use permit shall not be construed as an allegation that plaintiffs have alleged federal causes of action based on the violation of any federal law or regulation generally or specifically referenced in the permit or any application therefor. Further, to the extent the CZM Laws contain any citation of or reference to any federal laws, statutes or regulations, no claims or causes of action are alleged under those federal laws, statutes or regulations. Any allegation in this petition that any defendant has violated the CZM Laws shall not be construed as an allegation of a federal cause of action based on the violation of federal laws, statutes or regulations referenced in the CZM Laws. The quotation or reference in this petition to provisions of certain CZM Laws concerning “uses” of national or regional concern shall not be construed as an allegation that Plaintiffs are making claims arising under the Constitution, laws, or treaties of the United States. The use of the term “navigation” or such similar terms in the CZM Laws shall not be construed to imply that Plaintiffs are asserting maritime or admiralty claims.

(u) Plaintiffs do not plead any claim or cause of action pertaining to private property located within the Cameron Parish Coastal Zone: (1) that is the subject of any present or future demand for environmental restoration or remediation, regardless of whether the relief demanded is specific performance, damages or a mandatory or prohibitive injunction; or, (2) that is the

subject of any pending or future litigation under Act 312 of 2006 (La. R.S. 30:29, et seq., as amended). Plaintiffs do not seek injunctive relief. Further, Plaintiffs do not plead any claims related to any pending environmental statutory or regulatory claims or actions filed or taken by any federal agency, including, but not limited to, the Environmental Protection Agency and the U.S. Army Corps of Engineers.

34.

Subject to all of the limitations set forth in this petition, including, but not limited to, paragraph 33, Plaintiffs Parish of Cameron and the State of Louisiana claim all damages and remedies appropriate under the CZM Laws, including, but not limited to, restoration and remediation costs; actual restoration of disturbed areas to their original condition; costs necessary to clear, revegetate, detoxify and otherwise restore the affected portions of the Cameron Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M; declaratory relief in circumstances where such relief is required, in addition to money damages, to accomplish the purposes of La. R.S. 49:214.21 *et seq.*; costs and expenses of litigation, including costs of environmental assessments and expert costs, and reasonable attorney's fees; and all other damages or remedies provided for in La. R.S. 49:214.21, *et seq.*

35.

Plaintiffs allege that the damage caused by defendant's complained-of activities within the Operational Area resulted from the defendants' violation of coastal use permits *and* from unpermitted uses of the coastal zone. Plaintiffs' claims are limited to the civil remedies provided for in La. R.S. 49:214.36; plaintiffs do not assert claims for any criminal or quasi-criminal remedies set forth in La. R.S. 49:214.36.

36.

Plaintiffs allege that defendants are *solidarily* liable for the damage caused by defendant's complained-of activities within the Operational Area. The CZM Laws render the defendants liable for the cumulative impacts of their permit and regulatory violations. While the individual defendants may have acted independently of each other in certain circumstances, their

statutory, regulatory and permit violations resulted in “cumulative impacts” to the area of the coastal zone damaged by defendant’s complained-of activities within the Operational Area. “Cumulative Impacts” are defined in La. Admin. Code tit. 43, pt. I, § 700 as “impacts increasing in significance due to the collective effects of a number of activities.” La. Admin Code. tit. 43, pt. I, § 701 states that the “likelihood of, and extent of impacts of, resulting secondary impacts and cumulative impacts” “shall be utilized by the permitting authority in evaluating whether the proposed use is in compliance with the guidelines,” and that “all uses and activities shall be planned, sited, designed, constructed, operated, and maintained to avoid to the maximum extent practicable significant” “adverse effects of cumulative impacts.” The defendants’ unpermitted uses of the coastal zone the defendants’ violations of coastal use permits resulted in “cumulative impacts” to area of the coastal zone damaged by defendant’s complained-of activities within the Operational Area. Such damage could have been avoided had defendants followed the statutory and regulatory requirements of the CZM Laws. Further, the restoration requirements set forth in La. R.S. 49:214.36 D and E cannot be accomplished by ignoring the combined effects of multiple violations of the CZM Laws. La. R.S. 49:214.36 (E) provides for a “restoration” remedy that is “feasible and practical.” Restoration objectives must respond to environmental impacts caused by the cumulative effects of oil and gas operations. Both the CZM Laws and the LDNR Coastal Management Division’s standard operating procedures recognize the need to evaluate the cumulative and compound impacts of defendants’ violations. The statute mandating the development of the state’s master plan states: “The task of... restoring and developing a sustainable coastline will require implementation of a holistic, comprehensive engineering plan...” See La. R.S. 49:214.4.1(A)(3).

La. C. C. art. 1815 provides that an obligation is indivisible when the object of the performance is “not susceptible of division.” Indivisible obligations are subject to the rules governing solidarity. La. C.C.P. art. 1818. Under Louisiana law, if the consecutive and/or concurrent wrongful acts of defendants contribute in unknown proportions to property damage, defendants are *solidarily* liable because their obligations are indivisible.

37.

Plaintiffs demand trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants (subject to the limitations set forth in this petition), as follows:

- (a) Awarding damages and other appropriate relief specifically provided in the CZM Laws for violations of all applicable state coastal zone management program statutes and regulations within the Cameron Parish Coastal Zone;
- (b) Ordering the payment of costs necessary to clear, revegetate, detoxify and otherwise restore the Cameron Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M.
- (c) Requiring actual restoration of the Cameron Parish Coastal Zone to its original condition.
- (d) Awarding reasonable costs and attorney fees.
- (e) Awarding pre-judgment and post-judgment interest at the maximum rate allowable by law;
- (f) Such other and further relief available in the premises, subject to the limitations set forth in the petition.
- (g) Plaintiffs request trial by jury.

Respectfully submitted:

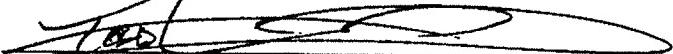
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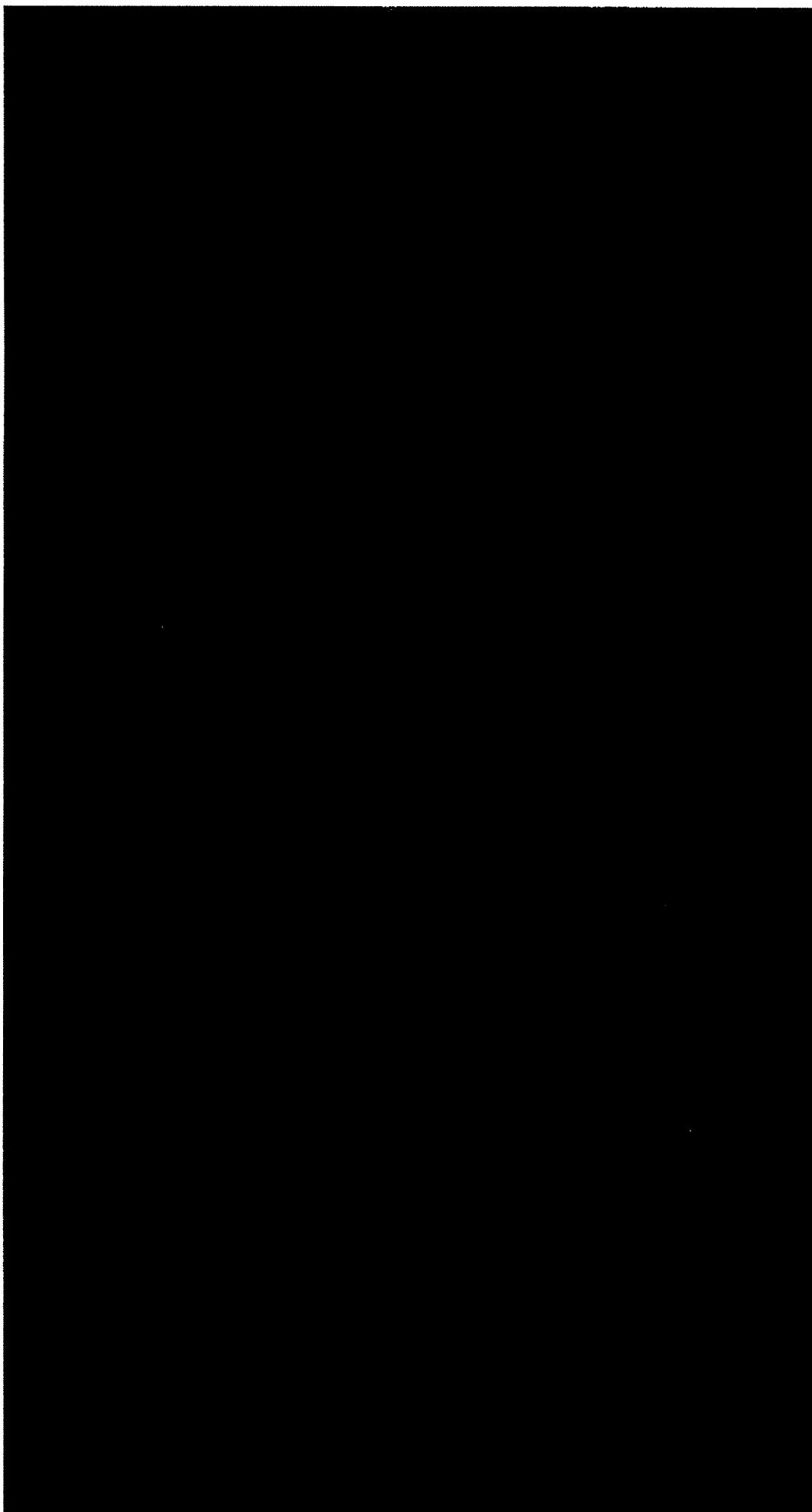
Fax: (337) 562-2391

Attorneys for Plaintiffs

PLEASE HOLD SERVICE

EXHIBIT A

Louisiana Coastal Zone Boundary



Hackberry

EXHIBIT B

Map of the Operational Area

(Overview)



Hackberry

EXHIBIT B

Map of the Operational Area

(Detail View)

2015 Aerial

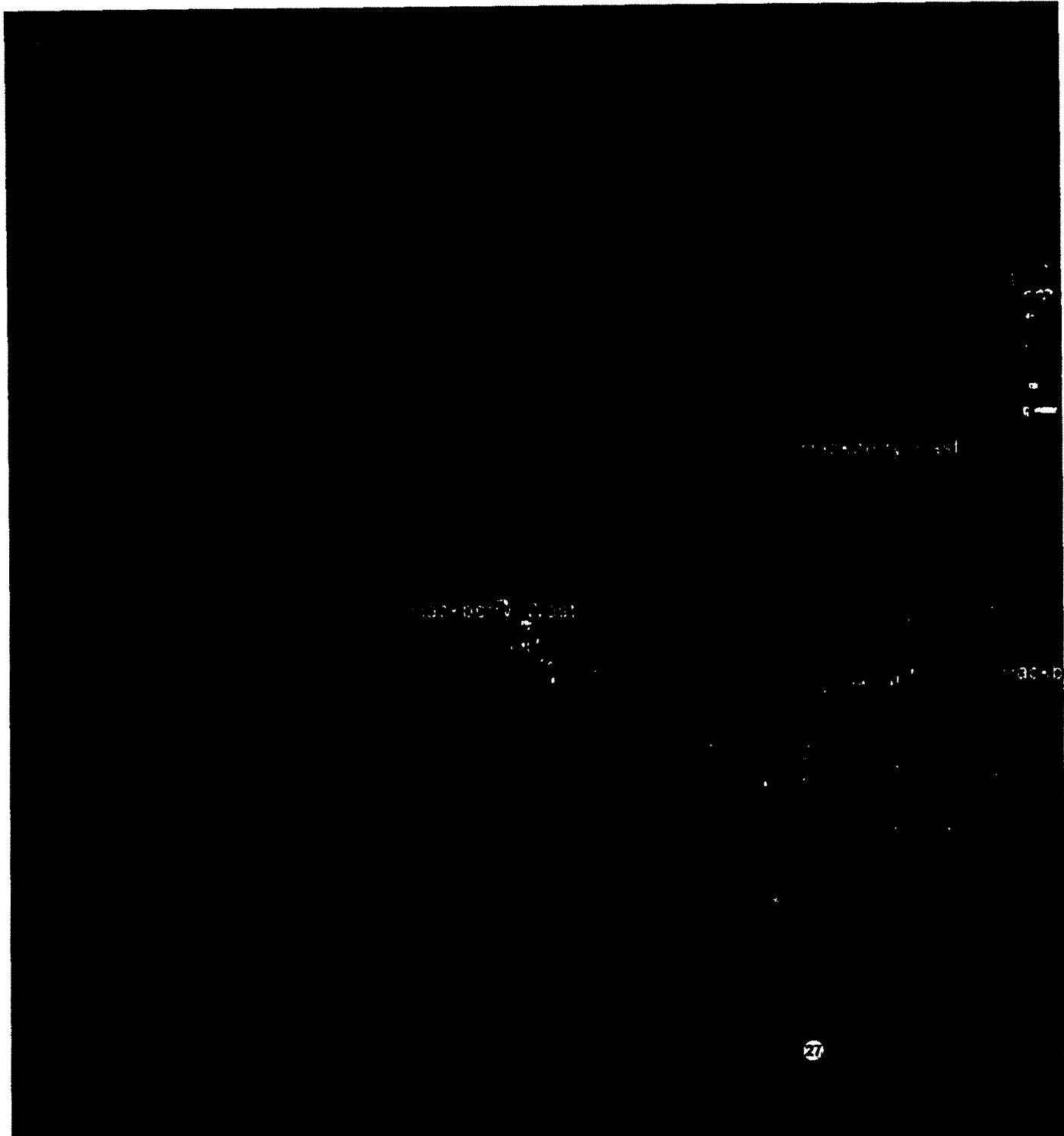


EXHIBIT C

Map of Coastal Use Permits within the Operational Area

Yellow and orange shapes represent work locations described in Coastal Use Permits.

Source: LDNR

2015 Aerial

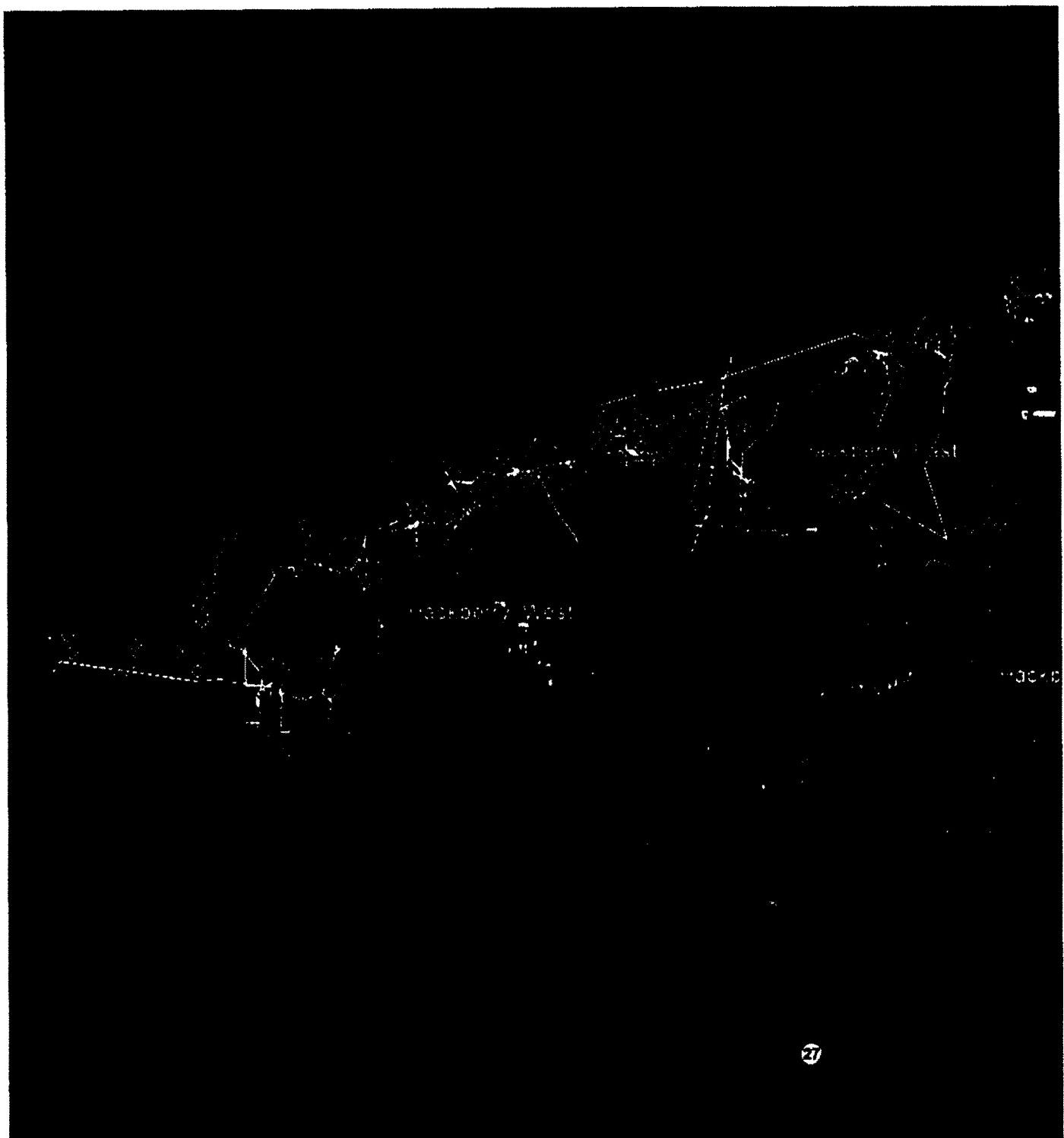


EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

COUPING	Description
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 174 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 170 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 172 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 173 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 175 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 171 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 174 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 170 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 172 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 173 // Status: Authorization Granted - Special Conditions
P19800103	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 175 // Status: Authorization Granted - Special Conditions
P19800103	SL 42 WELL NO 170
P19800103	SL 42 WELL NO 171
P19800103	SL 42 WELL NO 172
P19800103	SL 42 WELL NO 173
P19800103	SL 42 WELL NO 174
P19800103	SL 42 WELL NO 175
P19800367	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: WELL 24 // End: TANK BATTERY 14 // Status: Authorization Granted - Special Conditions
P19800367	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: WELL 24 // End: TANK BATTERY 14 // Status: Authorization Granted - Special Conditions

EXHIBIT DCoastal Use Permits for Work in the Operational Area

Permit No.	Description
P19810403	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' - 5' BLW ML // // Begin: SL 42 WELL #176 // End: STAB #13 // Status: Authorization Granted - Special Conditions
P19810403	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' - 5' BLW ML // // Begin: SL 42 WELL #176 // End: STAB #13 // Status: Authorization Granted - Special Conditions
P19810404	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' - 5' MIN BLW ML // // Begin: SL 42 WELL #178 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810404	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' - 5' MIN BLW ML // // Begin: SL 42 WELL #178 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810405	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #179 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810406	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #180 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810406	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #180 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810407	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #10 // Status: Authorization Granted - Special Conditions
P19810407	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #10 // Status: Authorization Granted - Special Conditions
P19810408	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810408	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #12 // Status: Authorization Granted - Special Conditions
P19810417	Amoco Production Co. - Install keyway and three 2" pipelines, Black Lake
P19810418	AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 3 2" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19811781	AMOCO PRODUCTON COMPANY - FLOWLINE // 12" FLOWLINE // BURIED 4 FT BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19811781	AMOCO PRODUCTON COMPANY - FLOWLINE // 6" FLOWLINE // BURIED 4 FT BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19820304	Gulf Oil Corp. - Construct board road and ring levee off existing shell road, 3.9 acres brackish marsh disturbed. 2 mi North of Hackberry
P19821379	Transcontinental Oil Corp - Construct board road and ring levee for well, 4.8 acres brackish marsh altered. 15 mi S of Sulphur

EXHIBIT DCoastal Use Permits for Work in the Operational Area

Permit No.	Description
P19821433	Transcontinental Oil Corp - Construct board road and drill site, 13800 cy brackish marsh dredged 15 mi S of Sulphur
P19821476	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19821476	AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19821477	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19821477	AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19821546	Transcontinental Oil Corp - 949' board road and drill site, 15 mi south of Sulphur
P19830244	Amoco Production Co. - Install and maintain flowline to production facilities, buried 5' below mud like, 170 cy spoil from dredging, Hackberry
P19830245	Amoco Production Co. - Dredge slip and install keyway to drill barge mounted rig, 18950 cy brackish marsh and canal bottom excavated and deposited on slip side, Hackberry Oil Field
P19830545	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19830545	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19830564	Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 23420 cy brackish marsh and canal bottom excavated, CPSB
P19830566	Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 6875 cy brackish marsh and canal bottom excavated, CPSB
P19830567	Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 5415 cy brackish marsh and canal bottom excavated, Gulf Land
P19830568	Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 7700 cy brackish marsh and canal bottom excavated, Gulf Land
P19830569	Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 7700 cy brackish marsh and canal bottom excavated, Gulf Land
P19830584	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#179 // Status: Authorization Granted - No Conditions
P19830585	AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 2 4" & 1 2.5" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19830648	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19830648	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19830649	Amoco Production Co. - Dredging 8800 cy fresh marsh for slip parallel to existing canal CPSB

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

Permit No.	Description
P19830871	Amoco Production Co. - Install keyway with barge mounted rig and 106 cy of spoil, Hackberry
P19830872	Amoco Production Co. - Install and maintain drilling barge, platform, dredge 360 cy for pipelines, Black Lake
P19830923	Amoco Production Co. - 17190 cy brackish marsh excavated and deposited in marsh habitat to construct oil and gas slip, 2 mi NW of Hackberry
P19830949	Amoco Production Co. - Dredge slip and install keyway to drill barge mounted rig. 24440 cy lake bottom excavated and deposited on slip side, E of Black Lake on CPSB
P19831109	AMOCO PRODUCTON COMPANY - FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANAL// // Begin: // End: // Status: Authorization Granted - No Conditions
P19831110	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19831111	AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - No Conditions
P19831188	AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - No Conditions
P19831189	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19831281	AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 2.4" & 1 2.5" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19831384	AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19831385	AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19831386	AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19831530	Vernon E. Faulconer, Jr - Construct drillsite and pit area adjacent to existing road, 4360 cy fill required, 16 mi S of Sulphur
P19831648	Albert J. Smith - Constructing long wharf extending outward into Atchafalaya River with mooring pilings, 1/2 mi S of Southern Pacific Railroad bridge
P19831708	Amoco Production Co. - Dredge 24535 cy open water bottom material to deposit in shallow open water to construct slip; West Hackberry oil field
P19831719	Amoco Production Co. - Dredge 22790 cy brackish marsh material and deposit into marsh habitat in construction of slip; East Hackberry field

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

Permit No.	Description
P19831720	Amoco Production Co. - Dredge slip and construct keyway in shallow open water area; 24320 cy spoil material deposited on slip; East Hackberry field
P19840028	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE & BURIED 5 FT BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19840028	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON SURFACE & BURIED 5 FT BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19840193	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840193	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840194	Amoco Production Co. - Install keyway to drill oil or gas well with barge mounted rig, canal will be swept for Gulf Land "D" r/a/ "A" Well no. 46
P19840195	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840195	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840209	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840209	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19840220	**Documents not available.
P19840759	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19840759	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19840771	Amoco Production Co. - dredge ~19.079 yd.^3 of open water bottom to construct 378' x 235' x 8' oil/gas slip; excavated material to be placed on existing spoil banks and spread in open water; S11, T12S-R10W
P19840772	Amoco Production Co. - West Hackberry Field; Install a keyway to drill oil/gas well with barge mounted rig; S16, T12S-R10W
P19840773	Amoco Production Co. - West Hackberry Field; Install a keyway to drill oil/gas well with barge mounted rig; S16, T12S-R10W
P19840940	Darsey Operating Co. - dredge ~8,667 yd.^3 and deposit to form ring levee and raise oil/gas drilling well pad; S13, T12S-R10W ~1.2 miles N Hackberry
P19841114	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUP #	Description
P19841114	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841115	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841115	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841116	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841116	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841117	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841117	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841126	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841126	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841127	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841127	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841128	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841128	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841129	Amoco Production Co. - S16, T12S-R10W; proposal to drill with barge mounted rig and lay flowlines, W. Hackberry Field
P19841178	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841178	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19841209	Amoco Production Co. - barge mounted rig and lay flowlines; S10, T12S-R10W

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

DRAFT ID	DESCRIPTION
P19841210	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#191 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19841210	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#191 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19841524	Amoco Production Co. - Install pumping unit in West Hackberry Field
P19841604	DREDGING3
P19850082	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#193 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions
P19850082	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#193 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions
P19850085	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#192 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions
P19850085	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#192 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions
P19850241	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850241	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850242	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850242	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850243	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANKS // // Begin: GULF LAND "A" R/A "C" WELL#237 // End: STAB TANK BATTERY#19 // Status: Authorization Granted - Special Conditions
P19850243	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANKS // // Begin: GULF LAND "A" R/A "C" WELL#237 // End: STAB TANK BATTERY#19 // Status: Authorization Granted - Special Conditions
P19850329	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#194 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - Special Conditions
P19850329	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#194 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - Special Conditions

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

Permit No.	Description
P19850410	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850410	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850411	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#195 // End: STAB TANK BATTERY#7 // Status: Authorization Granted - Special Conditions
P19850411	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#195 // End: STAB TANK BATTERY#7 // Status: Authorization Granted - Special Conditions
P19850423	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ACROS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850423	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850447	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW MUDLINE, 3104.5' LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850447	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BELOW MUDLINE, 3104.5' LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850561	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // SRF OF SPL BNK, 5' BLW SLIP BTM & CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850561	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // SRF OF SPL BNK, 5' BLW SLIP BTM & CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850656	Amoco Production Co. - Construct ring levee, road dump, and road ramp to drill well; W Hackberry Field
P19850657	Amoco Production Co. - Lay flowlines for well; W Hackberry
P19850677	Amoco Production Co. - Excavate 133 cy levee material as backfill for restoring old oil and gas waste pit; pit contents to be hauled to approved disposal site; W Hackberry Gas Injection System
P19850698	Amoco Production Co. - Drill well from existing keyway with barge mounted inland drilling rig; W Hackberry area
P19850708	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19850708	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19850709	Amoco Production Co. - Install keyway to drill oil or gas well with barge mounted rig, and lay flowlines; W Hackberry Field

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP ID	Description
P19850724	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850724	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850815	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850815	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850816	Amoco Production Co. - Install a keyway and drill with barge mounted drilling rig; West Hackberry Field
P19850821	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#198 // Status: Authorization Granted - No Conditions
P19850823	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: GULF LAND A R/A C WELL#232 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - No Conditions
P19850823	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: GULF LAND A R/A C WELL#232 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - No Conditions
P19850824	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850946	Amoco Production Co. - Excavate 169 cy spoil and brackish marsh to widen existing canal for service access; material will be placed on bank adjacent to excavated area; E Hackberry Field
P19850959	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850960	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#200 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - Permit Withdrawn
P19850985	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW CANAL & SLIP BTM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850985	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW CANAL & SLIP BTM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19850986	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW SLIP & CANAL MUDLINE, BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

Permit No.	Description
P19850986	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW SLIP & CANAL MUDLINE, BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851007	Amoco Production Co. - Fill existing borrow pit and overlay with limestone to construct parking lot and service area; 1512 cy clean fill used and 1674 cy to level; 2 mi N of Hackberry
P19851028	MARSH MANAGEMENT PLAN AREA
P19851028	Removed
P19851028	SPOIL1
P19851049	Amoco Production Co. - Construct ring levee, road ramp and drill pad; 5835 cy used; West Hackberry Field
P19851050	Amoco Production Co. - Lay flowlines for the Gulf Land D R/A A #50; West Hackberry
P19851051	Amoco Production Co. - Level location, overlay with shell, construct support structures, lay piping tie-ins to create a fuel gas expander plant; West Hackberry Field
P19851053	Amoco Production Co. - Install an addition to existing keyway to drill with barge mounted drilling rig; West Hackberry Field
P19851087	Amoco Production Co. - Lay flowlines; East Hackberry
P19851117	Amoco Production Co. - Install pipe bents on existing spoil banks to elevate flowlines; West Hackberry
P19851162	Amoco Production Co. - Install keyway to drill with barge mounted drilling rig; West Hackberry
P19851249	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19851249	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19851250	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: CAMERON PH SCHL BRD R/A C WELL#55 // End: STAB TANK BATTERY#14 // Status: Authorization Granted - Special Conditions
P19851251	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#201 // Status: Authorization Granted - No Conditions
P19851252	Amoco Production Co. - Install keyway to drill w/barge mounted drilling rig; no dredging; West Hackberry Field
P19851253	Amoco Production Co. - Install keyway; no dredging; West Hackberry Field
P19851334	Amoco Production Co. - Install keyway; no dredging; West Hackberry Field
P19851335	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#202 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions
P19851335	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#202 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

SURFACER	Description
P19851363	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: GULF LAND A R/A C WELL#244 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - Special Conditions
P19851363	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: GULF LAND A R/A C WELL#244 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - Special Conditions
P19851423	Amoco Production Co. - Install keyway & lay flowlines; East Hackberry Field
P19851442	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // ACROSS MARSH, 5' BELOW MUDLINE AT SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851442	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // ACROSS MARSH, 5' BELOW MUDLINE AT SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851468	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#200 // End: STAB TANK BATTERY#13 // Status: Authorization Granted - No Conditions
P19851507	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 3' BLW ML OPEN WATER, 10' BLW NATURAL WATER BODIES // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851530	Amoco Pipeline Company - 4" Pipeline replacement on canal in West Hackberry Oil Field, Sec. 14, T12S - R10W. ± 1300CY material to be deposited on spoil bank and used to backfill pipeline ditch upon completion of replacement.
P19851531	Amoco Pipeline Company - Replace 2039' of 4" pipeline. ± 907 CY to be excavated banked then used as cover, temporarily disturbing ± .5 acs. brak. marsh. Sec. 19, T12S - R10W
P19851547	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED BY BACKFILL, 5' BELOW CANAL&SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851547	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED BY BACKFILL, 5' BELOW CANAL&SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851581	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // ACROSS MARSH, BURIED AT CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851581	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // ACROSS MARSH, BURIED AT CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19851582	Amoco Production Co. - Sec. 18, T12S - R10W. 230' channel & 376' X 160' slip (± 9497 CY) to D/P the Gulf Land A R/A C. Well #247, lay two flowlines of 4" & 2.5" a total length of 2168.87'.
P19851607	Amoco Production Co. - Make a pipeline x-ing at the mouth of an access canal, East Hackberry Field, Sec. 14, T12S - R10W
P19860051	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED UNDER CANALS AND LAID ON MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

PERMIT NO.	DESCRIPTION
P19860051	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED UNDER CANALS AND LAID ON MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19860156	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#198 // End: STAB TANK BATTERY #8 // Status: Authorization Granted - No Conditions
P19860261	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#203 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19860261	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#203 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19860351	Amoco Production Co. - Cameron Parish School Board R/A B Well #56, Sec. 16, T12S - R10W, West Hackberry Field. Sweep existing canal to depth and width per drawings to I/M drill barge.
P19860384	Amoco Production Co. - Install one 4" & one 2.5" petroleum products pipelines ($\pm 1447.32'$) to serve Cameron Parish School Board Well #56.
P19860402	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#205 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19860402	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#205 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19860403	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#204 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19860403	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#204 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19860464	Amoco Production Co. - Sweep P/A existing slip to drill Cameron Parish School board A R/A C Well #57, West hackberry Field, Sec. 16, T12S - R10W.
P19860491	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // LAID ON MARSH AND BURIED 5 FT AT CROSSINGS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19860491	AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // LAID ON MARSH AND BURIED 5 FT AT CROSSINGS // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19860610	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#206 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19860610	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#206 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19860803	Amoco Production Co. - Sweep existing canal and construct keyway to bring in drill barge to D/P the Cameron Parish School Board Well #58, West Hackberry Field, Sec.10, T12S - R10W

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUP#	DESCRIPTION
P19860828	AMOCO PRODUCTON COMPANY - OIL/GAS // 2.5" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19860828	AMOCO PRODUCTON COMPANY - OIL/GAS // 4" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19860867	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#207 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19860867	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#207 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions
P19860868	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#208 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section
P19860868	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#208 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section
P19860978	Star Energy, Inc. - Star Energy - J.B. Watkins Est. #1 Well. 200' X 200' drillsite/pit area to be constructed adjacent to an existing road. A total of 3340 CY of fill will be required for the drill pad and 1300 CY for the ring levee. Located in Sec. 13, T12S - R10W.
P19861022	Amoco Production Co. - Keyway and flowlines to D/P SL 42 Well#209, Sec. 17, T12S - R10W
P19861043	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#211 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19861043	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#211 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19861051	AMOCO PRODUCTON COMPANY - OIL/GAS // 4" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19861604	SPOIL2
P19870087	Amoco Production Co. - I/M one 4.5" and one 2.5" petroleum products pipelines to serve the Gulf Land A R/A C Well #248, West Hackberry Field, Sec. 19, T12S - R10W 437.67' in canals & 1949.53' on marsh.
P19870125	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW M/L @ CANAL&X, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870125	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW M/L @ CANAL&X, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870134	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#212 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUB#	Description
P19870134	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#212 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section
P19870146	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW M/L @ CANAL, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870146	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW M/L @ CANAL, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870173	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#213 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19870173	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#213 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions
P19870198	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870198	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870308	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#215 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section
P19870308	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#215 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section
P19870310	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870310	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870390	Amoco Production Co. - Existing slip dredged for Gulf Land A R/A C Well #67 will be utilized for Gulf Land A R/A C Well #249. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 12, T12S - R10W
P19870404	Amoco Production Co. - Existing slip dredged for Gulf Land A R/A B Well #159 will be utilized for Gulf Land A R/A B Well #250. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 15, T12S - R10W
P19870405	Amoco Production Co. - Existing slip dredged for Gulf Land A R/A B Well #105 will be utilized for Gulf Land A R/A B Well #251. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 15, T12S - R10W
P19870409	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW SLIP&CANAL, SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP#	Description
P19870429	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870429	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870430	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870483	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#218 // End: STAB TANK BATTERY #8 // Status: Authorization Granted - No Conditions
P19870484	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#217 // End: STAB TANK BATTERY#8 // Status: Authorization Granted - No Conditions
P19870484	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#217 // End: STAB TANK BATTERY#8 // Status: Authorization Granted - No Conditions
P19870485	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#216 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19870485	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#216 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions
P19870564	AMOCO PRODUCTON COMPANY - FLOWLINE // 2" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870677	Amoco Production Co. - Perform maintenance dredging for existing canal system; 5 mi SW of Grand Lake
P19870689	Culvert
P19870689	MARSH MANAGEMENT PLAN AREA
P19870689	Pump
P19870689	TRENASS2
P19870689	TRENASSE 4'
P19870694	Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field
P19870698	Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field
P19870737	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE, 5' BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870737	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON SURFACE, 5' BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870743	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED UNDER SLIP&CANAL, LAID ON SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CLIP NO.	DESCRIPTION
P19870743	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // BURIED UNDER SLIP&CANAL, LAID ON SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870910	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19870911	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE, 5' MIN @ CANAL XING // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19870912	Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field
P19870943	AMOCO PRODUCTON COMPANY - POWER LINE // // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - No Conditions
P19871079	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Review complete Transferred to Consistency Section
P19871079	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Review complete Transferred to Consistency Section
P19871128	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19871128	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19871232	AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4" GAS LIFT LINE // LAID ON CATWLK, BACKFILLED, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19871286	Amoco Production Co. - Conduct sweeping operations to utilize existing canal, install keyway to drill with barge mounted rig for CPSB well; West Hackberry Field
P19871289	AMOCO PRODUCTON COMPANY - OIL/GAS // 2.5" OIL/GAS // LAID ON SURFACE, 5' MIN BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19871289	AMOCO PRODUCTON COMPANY - OIL/GAS // 4.5" OIL/GAS // LAID ON SURFACE, 5' MIN BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19880313	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880313	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880334	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880334	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880342	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions

EXHIBIT DCoastal Use Permits for Work in the Operational Area

PERMIT NO.	DESCRIPTION
P19880342	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880348	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880348	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880586	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880586	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880587	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880587	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880588	AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19880588	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions
P19881133	AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // MARSH LEVEL, 3' MIN BLW M/L @ XING // // Begin: S.T.A.B. #21 // End: S.T.A.B. #17 // Status: Authorization Granted - Special Conditions
P19890242	Amoco Production Co. - Perform maintenance dredging for existing canal system; 5 mi SW of Grand Lake
P19900113	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // LAID ON MARSH SURFACE // // Begin: S.T.A.B. #6 FACILITIES // End: AMOCO GLAC WELL #253 // Status: Authorization Granted - Permit Withdrawn
P19900113	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // LAID ON MARSH SURFACE // // Begin: S.T.A.B. #6 FACILITIES // End: AMOCO GLAC WELL #253 // Status: Authorization Granted - Permit Withdrawn
P19900180	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // ON EXISTING CATWALK, 5' BLW BOAT CHANNEL // // Begin: TANK BATTERY # 5 // End: TIE IN TO EXISTING 4.5" FLOWLINE // Status: Authorization Granted - No Conditions
P19900279	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // LAID ON MARSH // // Begin: NO. 1 WELLSITE // End: TIE-IN TO AN EXISTING 4.5" FLOWLINE // Status: Authorization Granted - No Conditions
P19900939	Chevron U.S.A. Inc. - Repair abandonned East Hackberry #62 site to level surface & install temporary board mat to drill well #79, Sec. 12, T12S - R10W. 1000 CY of fill obtained from a commercial source will be hauled onto site.
P19901063	Amoco Production Co. - Sweep existing drill site to D/P the Gulf Land A R/A C Well #254, West hackberry Field.

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUP#	Description
P19901080	Valley Gas Transmission, Inc. - Dredge ±250 CY of waterbottom material to lower an existing 4.5" pipeline to a depth of 6' below the mud line, then backfill. Sec. 20, T12S - R10W
P19901121	Amoco Production Co. - Maintenance dredging in an existing O/G canal system.±50000 CY of water bottom material will be dredged, T12S - R11W & T12S - R11W. Specifically mentioned is, maintenance dredging, Gulf Land A R/A C Well #42, West Hackberry Field, Sec. 19, T12S - R10W. Accompanying as-built gives an average of material removed ±593 CY
P19901262	AMOCO PRODUCTON COMPANY - GAS COLLECTION // 2.5" FLOWLINE // 3' MINIMUM BELOW MUDLINE // // Begin: GULF LAND A R/A C WELL NO. 254 // End: HEADER @ S.T.A.B. 6 // Status: Authorization Granted - No Conditions
P19901262	AMOCO PRODUCTON COMPANY - GAS LIFT // 2.5" FLOWLINE // 3' MINIMUM BELOW MUDLINE // // Begin: RISER @ PLATFORM // End: HEADER @ S.T.A.B. 6 // Status: Authorization Granted - No Conditions
P19901274	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' MINIMUM BELOW MUDLINE // // Begin: GULF LAND D R/A A WELL NO. 49 // End: S.T.A.B. 3 // Status: Authorization Granted - Special Conditions
P19901274	AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' MINIMUM BELOW MUDLINE // // Begin: GULF LAND D R/A A WELL NO. 49 // End: S.T.A.B. 3 // Status: Authorization Granted - Special Conditions
P19910076	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 3'-5' BLW MUDLINE @ XING // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19910076	AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4" GAS LIFT LINE // ABOVE GROUND, 3'-5' BLW MUDLINE @ XING // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19910106	Culvert
P19910106	DREDGE
P19910106	Protection
P19910118	AMOCO PRODUCTON COMPANY - FLOWLINE *REPAIR/REPLCMNT // 4.5" FLOWLINE *EMERGENCY AFTER-THE-FACT // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19910492	AMOCO PRODUCTON COMPANY - FLARE LINE // 8" FLARE LINE // 3' MIN BLW GROUND // // Begin: EAST HACKBERRY FACILITIES // End: FLARE STACK // Status: Authorization Granted - Permit Withdrawn
P19910622	Amoco Production Co. - Flare line (8") & flare stack, 658' to be laid on surface of marsh & 16' to be buried under existing road. West Hackberry Facilities, Sec. 19, T12S - R10W
P19910716	AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4.5" PIPELINE // ALONG EXISTING SPOIL BANK // // Begin: EXISTING S.T.A.B. FACILITY // End: TIE-IN TO EXISTING 4.5 GAS LIFT LINE (POINT A) // Status: Authorization Granted - No Conditions
P19910716	AMOCO PRODUCTON COMPANY - OIL & WATER DUMP LINE // 4.5" OIL & WATER DUMP LINE // ALONG SHELL ROAD & ACROSS EXISTING PIPE RACK // // Begin: EXISTING S.T.A.B. FACILITY // End: TIE-IN TO EXISTING 4.5" OIL & WATER DUMP LINE // Status: Authorization Granted - No Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

GROUP#	DESCRIPTION
P19910766	AMOCO PRODUCTON COMPANY - PIPELINE // 4" PIPELINE // ON CATWALK, 3' MIN BLW MUDLINE // // Begin: TIE-IN @ EXISTING 4" P/L, SWDS #1 // End: S.L. 42 WELL # 194 // Status: Authorization Granted - No Conditions
P19910906	AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 2.5" GAS LIFT LINE // 3' MIN BLW SLIP, LAID ALONG SPOIL BANK // // Begin: PROPOSED GULF LAND D R/A A WELL # 52 // End: TIE-IN AT ABANDONED 2.5" PIPELINE // Status: Authorization Granted - Special Conditions
P19910906	AMOCO PRODUCTON COMPANY - OIL PRODUCTION PIPELINE // 4" OIL PRODUCTION PIPELINE // 3' MIN BLW SLIP, LAID ALONG SPOIL BANK // // Begin: PROPOSED GULF LAND D R/A A WELL # 52 // End: TIE-IN AT ABAMDONED 4" PIPELINE // Status: Authorization Granted - Special Conditions
P19910949	AMOCO PRODUCTON COMPANY - // 2.5" PIPELINE // 3' MIN BLW ML // // Begin: WELL 53 // End: TIE IN @ EXISTING 2 LINES // Status: Authorization Granted - Special Conditions
P19910949	AMOCO PRODUCTON COMPANY - // 4" PIPELINE // 3' MIN BLW ML // // Begin: WELL 53 // End: TIE IN @ EXISTING 2 LINES // Status: Authorization Granted - Special Conditions
P19911111	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 3' BML / BANKS / PLATFORM // // Begin: GULF LAND D R/A A WELL NO 54 // End: TIE IN AT EXISTING F/L // Status: Authorization Granted - No Conditions
P19911111	AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // 3' BML / BANKS / PLATFORM // // Begin: GULF LAND D R/A A WELL NO 54 // End: TIE IN AT EXISTING F/L // Status: Authorization Granted - No Conditions
P19920004	AMOCO PRODUCTON COMPANY - GAS // 6" EMERGENCY GAS VENT LINE // ON PIPE RACK AND 1' BLW PARKING AREA // // Begin: LEVEE // End: TANK BATTERY #5 // Status: Authorization Granted - No Conditions
P19920005	AMOCO PRODUCTON COMPANY - GAS // 4" EMERGENCY GAS VENT LINE // ABOVE GROUND ON PIPE RACK // // Begin: LEVEE // End: TANK BATTERY // Status: Authorization Granted - No Conditions
P19920010	Cameron Parish Police Jury - Christmas tree bank sediment capture/wave dampening project. Secs. 14 & 23, T12S - R10W
P19920016	MMP Area
P19920016	SPOIL
P19920016	Weir
P19920170	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // 3' BLW MUDLINE // // Begin: GULF LAND A R/A C WELL # 42 // End: HEADER @ STAB UNIT // Status: Authorization Granted - No Conditions
P19920290	AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // ON LIMESTONE // // Begin: WELL #14 // End: TIE IN @ GAS LIFT LINE // Status: Authorization Granted - No Conditions
P19920493	AMOCO PRODUCTON COMPANY - GAS // 2 1/2" GAS LIFT LINE // 3' MIN BLW ML // // Begin: WELL NO 248 // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions
P19920493	AMOCO PRODUCTON COMPANY - GAS // 2 1/2" GAS LIFT LINE // 3' MIN BLW ML // // Begin: // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions

EXHIBIT DCoastal Use Permits for Work in the Operational Area

Permit No.	Description
P19920493	AMOCO PRODUCTON COMPANY - OIL // 2 1/2" OIL PROD. FLOWLINE // 3' MIN BLW ML // // Begin: // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions
P19920493	AMOCO PRODUCTON COMPANY - OIL // 4" OIL PRODUCTION FLOWLINE // 3' MIN BLW ML // // Begin: WELL NO 248 // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions
P19920681	CAMERON TELEPHONE CO - FIBER OPTICS // FIBER OPTIC TOLL CABLE // 3' BLW ML ; 10' MIN BLW ML @ CANAL XING // // Begin: ALONG HIGHWAYS 27 & 82 // End: // Status: Authorization Granted - Special Conditions
P19920964	Amoco Production Co. - Reentry/workover ops. of P&A Mrs. J. B. Watkins Well No. 2, West hackberry Field, Sec. 24, T12S - R11W
P19920996	Amoco Production Co. - Cleanout existing slip to float in workover rig. R/W of P&A Gulf Land D R/A A Well # 17, West Hackberry Field, Sec. 24, T12S - R11W
P19921087	Amoco Production Co. - Reenter/workover Gulf Land DR/A A Well #41, by moving drill rig, discharge mud and water into slip, in West Hackberry Field, Sec. 25, T12S - R11W
P19921089	Amoco Production Co. - Reenter/workover Gulf Land DR/A A Well #56 (formerly #13), by moving drill rig, discharge mud and water into slip, in West Hackberry Field, Sec. 24, T12S - R11W
P19921162	AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // PIPE RACKS // // Begin: MRS. J.B. WATKINS # 25 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions
P19921162	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // PIPE RACKS // // Begin: MRS. J. B. WATKINS #25 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions
P19921162	AMOCO PRODUCTON COMPANY - PRODUCTION // 4" PRODUCTION LINE // ROAD PAD / PIPE RACKS // // Begin: EXISTING FLOWLINE // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions
P19921207	Cameron Parish Police Jury - Construct six wave dampening fences using x-mas trees, with a total length of 918', SE corner of Black Lake
P19921230	AMOCO PRODUCTON COMPANY - // 2" COMPRESSOR SCRUBBER DUMP LINE // PIPE RACK / ON OR SUSPENDED OVER PAD @ T. B. // // Begin: COMPRESSOR STATION // End: TANK BATTERY // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - // 2" WELLHEAD SCRUBBER DUMP LINE // 2' DEEP IN CASING @DR DUMP/ON PIPERACKS // // Begin: SCRUBBER AT WELL PAD // End: TANK BATTERY // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - // 2" WELLHEAD SCRUBBER DUMP LINE // WELLHEAD PLTFRM/SUSPENDED/PIPERACK// // Begin: SCRUBBER ON WELLHEAD PLATFORM // End: TANK BATTERY // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // 1' DEEP IN CASING @RD DUMP/GROUND/PIPERACK// // Begin: TIE-IN TO EXT 4" LINE // End: TIE-IN TO EXT 4" LINE // Status: Authorization Granted - No Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

MUP ID#	Description
P19921230	AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // SUSPENDED/PIPERACKS/GROUND/1'DEEP/DUMP... // // Begin: WELLHEAD 18 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // WELLHEAD PLTFRM/UNDRSLIP/GROUND/PIPE RACK... // // Begin: STAB #5 // End: WELLHEAD PLATFORM // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - AIR // 2" AIR INJECTION LINE // 2' DEEP IN CASING @ RD DUMP / ON PIPE RACK // // Begin: COMPRESSOR STATION // End: WELL PAD // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - AIR // 2" AIR INJECTION LINE // 2' DEEP/PIPERACK/WELLHEAD/UNDER CANAL // // Begin: COMPRESSOR STATION // End: WELLHEAD GLDA 51 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - AIR // 2.5" AIR INJECTION LINE // 2' DEEP/GROUND/PIPERACKS/UNDER CANAL/WELLHEAD // // Begin: COMPRESSOR STATION // End: EXISTING SPARE FLOWLINE TO TIE-IN AT TANK BATTERY #5 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - GAS // 2.5" FUEL GAS LINE // SUSPENDED OVER PAD @ STAB 5 / PIPE RACKS // // Begin: METER STATION // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // 1' DEEP IN CAS@RDUMP/ ONGROUND/ PIPERACK... // // Begin: WELLHEAD GLDA 56 // End: TIE-INT TO SPARE FLOWLINE FROM STAB #5 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // GROUND/PIPERACK/2'DEEP/UNDERCANAL&SLIP... // // Begin: STAB #5 // End: WELLHEAD GLDA 57 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // PIPE RACK / 1' DEEP IN CASING AT ROAD DUMP // // Begin: TIE-IN TO EXT LINE // End: WELLHEAD J.B.W 18 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - OIL // 2" OIL SUMP DRAIN LINE // PIPE RACK / SUSPENDED OVR PAD @ COMPRESSOR // // Begin: TANK BATTERY // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - OIL/GAS // 2.5" // // // Begin: COMPRESSOR STATION // End: RISER TO SPARE FLOWLINE // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - PRODUCTION LINE // 4" PRODUCTION LINE // SLIP/WELLHEAD/SUSPENDED@PIPERACKS/GROUND... // // Begin: WELLHEAD GLDA 56 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - RAINWATER // 2" RAINWATER SUMP DRAIN LINE // PIPE RACK / SUSPENDED...FACILITY AND TANK BAT // // Begin: TANK BATTERY // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUP#	DESCRIPTION
P19921230	AMOCO PRODUCTON COMPANY - WATER // 2" PURGE WATER LINE // 2' DEEP IN CASING @RD DUMP/ON PIPERACK // // Begin: WATER PUMP NEAR TANK BATTERY // End: WELL PAD // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - WATER // 2" PURGE WATER LINE // PIPERACK/2' DEEP/SUSPENDED/UNDER CANAL/WELLHD // // Begin: PUMP NEAR T.B. // End: WELLHEAD GLDA 51 // Status: Authorization Granted - No Conditions
P19921230	AMOCO PRODUCTON COMPANY - WATER // 4" WATER STORAGE FILL LINE // ON WKWAY / ON GRND / 1' DP IN CSING @ RD DUMP // // Begin: TANK BATTERY // End: BARGE DOCK // Status: Authorization Granted - No Conditions
P19930047	Amoco Production Co. - Mnt.Drdg., spoil disposal, compressor barge, shell pad, pilings, boat dock, walkway and shell pad in West hackberry Field, Sec. 24, T12S - R11W
P19930575	LA DNR/ Coastal Restoration - Conduct a demonstration earthen terracing project, Sec. 26, T12S - R11W
P19930627	Southern Petroleum Company - Transferred to WRT Energy Corporation. Refurbish & reuse, including laying boards on an existing shell road, existing ring levee and drill pad to drill the M. P. Ewin "A" #66 Well, Sec. 12, T12S - R10W
P19930781	TRIDENT NGL - // 8" REPLACEMENT PIPELINE // 7' MIN BLW MARSH / 5' MIN BLW CANAL XING // // Begin: // End: // Status: Authorization Granted - Special Conditions
P19931321	AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // ON GROUND // // Begin: WELL # 17 // End: MAINFOLD @ HEADER // Status: Authorization Granted - No Conditions
P19931321	AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // ON GROUND // // Begin: WELL # 17 // End: GAS LIFT HEADER // Status: Authorization Granted - No Conditions
P19940676	WRT ENERGY CORP - GAS // 4" PIPELINE // TOP OF GROUND TO 3' BLW ML // // Begin: B. VINCENT WELL # 7 // End: PLANT FACILITY // Status: Authorization Granted - Special Conditions
P19940920	AMOCO PRODUCTON COMPANY - OIL // 4" PIPELINE // ON GROUND/ON PIPERACKS/3' BML@OPEN WATER // // Begin: EXISTING PIPELINE // End: EXISTING PIPELINE // Status: Authorization Granted - Special Conditions
P19941076	AMOCO PRODUCTON COMPANY - GAS // 2 1/2" GAS LIFT LINE // PLATFORM/SPOILBANKS/ 3' BML@WATER/PIPE BNTS // // Begin: WELL NO 55 // End: TIE-IN TO EXISTING LINES ON PIPE BRIDGE // Status: Authorization Granted - Special Conditions
P19941076	AMOCO PRODUCTON COMPANY - PRODUCTION // 4" PRODUCTION PIPELINE // PLATFORM/SPOILBANKS/ 3' BML@WATER/PIPE BNTS // // Begin: WELL NO 55 // End: TIE-IN TO EXISTING LINES ON PIPE BRIDGE // Status: Authorization Granted - Special Conditions
P19951188	AMOCO PRODUCTON COMPANY - AIR // 2" AIR INJECTION FLOWLINE // ON PIPE RACKS, PILINGS, & WELL PAD // // Begin: EXISTING AIR INJECTION LINE // End: WELLHEAD J.B WATKINS 18 // Status: Authorization Granted - No Conditions

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CURRNO	Description
P19951411	Amoco Production Co. - Maintenance dredging (\pm 18 linear miles) for O/G access channels, canals & slips in Hackberry Field east & west of Black Lake, T12S - R10W and T12S - R11W.
P19960112	PROPOSED CULVERTS AND WATER CONTROL STRUCTURE
P19960112	PROPOSED REMOVAL OF OLD BOX CULVERTS
P19960445	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" INJECTION FLOWLINE // 3' MIN BLW MUDLINE // // Begin: PROPOSED RISER/JUNCTION // End: SL 42 WELL #98 // Status: Authorization Granted - Special Conditions
P19960445	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" INJECTION FLOWLINE // 3' MIN BLW MUDLINE UNDER LAKE // // Begin: PROPOSED 3" P/L // End: WELL #245 // Status: Authorization Granted - Special Conditions
P19960445	AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" INJECTION FLOWLINE // LAID ON PIPE BRIDGE / 10' BLW CHANNEL XING // // Begin: TIE-IN TO SPARE F/L @ T.B. #5 // End: PROPOSED RISER/JUNCTION // Status: Authorization Granted - Special Conditions
P19960445	AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" INJECTION FLOWLINE // ON PIPE BRIDGE // // Begin: PROPOSED 3" P/L // End: END OF PIPE BRIDGE // Status: Authorization Granted - Special Conditions
P19960947	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" AIR INJECTION LINE // 3' MIN BLW MUDLINE // // Begin: RISER/JUNCTION @ PIPE BRIDGE // End: SL 42 WELL #172 // Status: Authorization Granted - Special Conditions
P19960947	AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" AIR INJECTION LINE // LAID ON PIPE BRIDGE / 3' BLW MUDLINE // // Begin: JUNCTION ON PIPE BRIDGE // End: TIE-IN @ EXISTING 3" LINE // Status: Authorization Granted - Special Conditions
P19960947	JUNCTION ON PIPE BRIGE
P19960947	RISER/JUNCTION ON PIPE BRIDGE
P19961822	Amoco Production Co. - Pilings or dolphins. Well name: SL 42 Well # 225. Sec. 19, T12S - R10W
P19961823	WELL #225 + STRUCTURES
P19970238	SL 42 WELL #226; DRILL BARGE & STRUCTURES
P19971085	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2 1/2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: RISER/JUNCTION // End: PROPOSED RISER @ SL 42 WELL #175 // Status: Authorization Granted - Special Conditions
P19971085	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2 1/2" FLOWLINE // LAID ON TOP OF SPOIL / 3' MIN BLW ML @ CANAL & SLIP // // Begin: RISER @ STAB 14 // End: WELL #58 // Status: Authorization Granted - Special Conditions
P19971102	AMOCO PRODUCTON COMPANY - FLARE GAS // 4" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #204 RISER // End: SL 42 WELL #98 RISER // Status: Authorization Granted - Special Conditions
P19971102	RISER 4" @ SL 42 WELL #204
P19971102	RISER 4" @ SL 42 WELL #98
P19971105	AMOCO PRODUCTON COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 RISER WELL #221 // End: STAB UNIT 9 RISER // Status: Authorization Granted - Special Conditions
P19971105	RISER 2" @ SL 42 WELL #221

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CURNO	Description
P19971105	RISER 2" @ STAB UNIT #9
P19971106	AMOCO PRODUCTON COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #220 RISER // End: STAB UNIT 9 RISER // Status: Authorization Granted - Special Conditions
P19971106	RISER 2" @ SL 42 WELL #220
P19971107	AMOCO PRODUCTON COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #222 RISER // End: STAB UNIT #10 RISER // Status: Authorization Granted - Special Conditions
P19971107	RISER 2" @ SL 42 WELL #222
P19971107	RISER 2" @ STAB UNIT #10
P19971607	AMOCO PRODUCTON COMPANY - FLOWLINE // 2" // LAID ON PIPE BRIDGE & 3' MIN BLW ML @ CHANNEL & SLIP // // Begin: SL 42 WELL #225 // End: STAB UNIT #8 // Status: Authorization Granted - Special Conditions
P19971607	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // LAID ON PIPE BRIDGE & 3' MIN BLW ML @ CHANNEL & SLIP // // Begin: SL 42 WELL #225 // End: CENTRAL FACILITY #2 // Status: Authorization Granted - Special Conditions
P19971620	AMOCO PRODUCTON COMPANY - FLOWLINE // 2" // 3' MIN BLW MUDLINE // // Begin: RISER @ SL 42 WELL #226 // End: TIE IN @ STAB UNIT #8 // Status: Authorization Granted - Special Conditions
P19971620	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW MUDLINE / LAID ON CATWALK // // Begin: RISER @ SL 42 WELL #226 // End: CENTRAL FACILITY #2 // Status: Authorization Granted - Special Conditions
P19971620	PROPOSED LINE HEATER PLATFORM NOT INSTALLED
P19972002	Samuel Gary Jr & Ass - Well Name: Gulf Land D R/A B. Well #58. Dredge: ring levee new O/G only(4626 CY). Sec. 23, T12S - R11W. Impacts: 3.76 acs..
P19980304	MAINT.DREDGE BARGE BASING
P19980403	CLEANOUT ROADSIDE DITCHES & MAINTENANCE ON LA 27
P19980403	CLEANOUT ROADSIDE DITCHES & MAINTENANCE ON LA 82
P19980468	Samuel Gary Jr & Ass - Well: Gulfland A R/A. Well #1. Lat: 29 59 33.7711056 Long: -93 25 46.5638772. Impacts: 2.06 acs..
P19980552	AMOCO PRODUCTON COMPANY - AIR INJECTION // 2" FLOWLINE // ATOP SPOIL BANK & 3' MIN BLW ML @ SLIP // // Begin: RISER @ GLDA #45 PLATFORM // End: TIED-IN @ EXISTING F/L // Status: Authorization Granted - Special Conditions
P19980765	AMOCO PRODUCTON COMPANY - GAS // 4" PIPELINE // 3' MIN BLW MUDLINE // ACTIVE // Begin: GLAC #255 LOC // End: TIE-IN @ PIPE RACK // Status: Authorization Granted - Special Conditions
P19980765	AMOCO PRODUCTON COMPANY - SPARE LINE // 4" PIPELINE // 3' MIN BLW MUDLINE // // Begin: GLAC #255 LOC // End: TIE-IN @ PIPE RACK // Status: Authorization Granted - Special Conditions
P19980848	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW CANAL AND CHANNEL, ON TOP OF SPOIL // // Begin: GLAC #255 UNDER WELL PAD // End: TIE IN AT STAB #3 // Status: Authorization Granted - Special Conditions
P19980848	AMOCO PRODUCTON COMPANY - GAS // 2" // 3' MIN BLW CANAL AND CHANNEL, ON TOP OF SPOIL // // Begin: GLAC #255 UNDER WELL PAD // End: TIE IN AT STAB #3 // Status: Authorization Granted - Special Conditions

Hackberry

EXHIBIT DCoastal Use Permits for Work in the Operational Area

CUP ID	DESCRIPTION
P19980899	AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW CANAL AND OPEN WATER, TOP OF SPOIL // // Begin: WELL PAD // End: TIE IN W/ EXISTING FLOWLINES // Status: Authorization Granted - Special Conditions
P19980899	AMOCO PRODUCTON COMPANY - GAS // 2" // 3' MIN BLW CANAL AND OPEN WATER, TOP OF SPOIL // // Begin: WELL PAD // End: TIE IN W/ EXISTING FLOWLINES // Status: Authorization Granted - Special Conditions
P19981706	SL 42 WELL #2; STRUCTURES FOR DRILLING WELL
P19981707	SL 42 WELL #1; STRUCTURES FOR DRILLING WELL
P19990125	Samuel Gary Jr & Ass - Well: Gulfland D R/A B. Well #2. Sec. 23, T12S - R11W. Impacts: 2.49 acs..
P19990133	CULVERT, FILL
P19990140	ADD LEVEE & METAL BULKHEAD
P20001402	FILL WATER CONTR
P20001402	MAHAN, CHIP - NOT A PIPELINE // DREDGING // // // Begin: // End: // Status: Application Withdrawn
P20001402	REVERSIBLE PUMP
P20001402	Weir
P20010402	H2O CONROL STRUCTURE
P20010402	REVERSIBLE PUMP
P20010402	WEIR, CULVERT
P20010621	DREDGE
P20010621	SPOIL
P20011227	DREDGE
P20011227	PROPWASH
P20011227	SIDETRACK, DRILL BARGE
P20011227	SPOIL
P20011366	DREDGE
P20011366	SPOIL
P20011621	DREDGE
P20011621	SPOIL
P20011696	DREDGING
P20011696	PROPWASH
P20011696	SPOIL
P20020433	TEMPORARY PILINGS
P20020849	LODGE
P20020894	GLAC WELL # 243
P20021048	GARY WILLIAMS PRODUCTION COMPANY - NOT A PIPELINE // WALKWAY // // // Begin: // End: // Status: Authorization Granted - Special Conditions
P20021048	GARY WILLIAMS PRODUCTION COMPANY - PIPELINE // 6" // 3' - 5' MIN BLW ML / LAID ON PIPERACK // // Begin: SL 17163 PROPOSED PLATFORM // End: TANK BATTERY NO 5 // Status: Authorization Granted - Special Conditions
P20021048	LINE HEATER PLATFORM W/ BOAT DOCK
P20021403	DREDGE FOR WELL 244

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

PERMIT NO.	DESCRIPTION
P20021403	PROP. GLAC WELL 244
P20021537	GEOTECHNICAL INVESTIGATION
P20030192	HILCORP ENERGY COMPANY - FLOWLINE // 3" // ON DRY MARSH & 3' MIN BLW ML @ OPEN WATER // // Begin: EXISTING PLATFORM // End: GLAC WELL # 243 // Status: Authorization Granted - Special Conditions
P20030192	HILCORP ENERGY COMPANY - GAS LIFT LINE // 2" // ON DRY MARSH & 3' MIN BLW ML @ OPEN WATER // // Begin: EXISTING PLATFORM // End: GLAC WELL # 243 // Status: Authorization Granted - Special Conditions
P20030192	SHORELINE EROSION CONTROL : 20' OF RIP-RAP
P20030625	4 TERRACES TO CONTROL EROSION
P20030625	TWO ACRE POND
P20040353	PLUG & ABANDON WATKINS NO. 035
P20041774	BENEFICIAL USE FOR P20020932 - AREA 'L'
P20041774	BENEFICIAL USE FOR P20020932 - ZONE 1
P20041774	MARSH MITIGATION AREA - FINAL
P20051041	BANK STABILIZATION
P20051041	HILCORP ENERGY COMPANY - FLOWLINE // 4" // 3' - 5' BLW WL & MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions
P20051041	HILCORP ENERGY COMPANY - FLOWLINE // 6" // 3' - 5' BLW WL & MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions
P20060185	BANK STABILIZATION
P20060185	HILCORP ENERGY COMPANY - FLOWLINE // 4" // 5' MIN BLW WATERLINE & TOP OF MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions
P20060185	HILCORP ENERGY COMPANY - FLOWLINE // 6" // 5' MIN BLW WATERLINE & TOP OF MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions
P20060300	MITIGATION FOR P20041751- TERRACES/PLANTINGS
P20060360	SITE CLEARANCE SL 42 #194 WELL
P20060565	TERRACES
P20060757	BANK STABILIZATION
P20060757	HILCORP ENERGY COMPANY - FLOWLINE // 4" // LAID ON TOP OF GROUND & 3' MIN BLW ML // PROPOSED // Begin: GULF LAND NO 116 // End: EXIST. S.T.A.B. NO 17 // Status: Authorization Granted - Special Conditions
P20061146	SITE CLEARANCE SL 42 NO 194 WELL
P20061148	ENTERGY GULF STATES, INC. - NOT A PIPELINE // AREAWIDE - TRANSMISSION REPAIRS // // // Begin: HOLLY TAP STATION // End: CHOUIQUE SUBSTATION // Status: Application Withdrawn
P20061148	ENTERGY GULF STATES, INC. - NOT A PIPELINE // AREAWIDE - TRANSMISSION REPAIRS // // // Begin: SABINE SUBSTATION // End: CARLYSS SUBSTATION // Status: Application Withdrawn
P20070392	ENTERGY NEW STRUCTURE
P20070392	ENTERGY STRUCTURE REPAIR

Hackberry

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

Permit No.	Description
P20070896	BORING LOCATION
P20070896	CAMERON PARISH WATER WORKS DISTRICT NO. 2, WARD 6 - WATERLINE // 8" // 3' - 15' BLW ML // PROPOSED // Begin: HACKBERRY // End: SEMPRA LNG FACILITY // Status: Authorization Granted - Special Conditions
P20071762	PLUG & ABANDON
P20080450	CAVERN WELL #1
P20080450	CAVERN WELL #2
P20080450	CAVERN WELL #3
P20080450	CAVERN WELL #4
P20080450	LA STORAGE LLC - BRINE PIPELINE // 16" // 4.5' BLW ML // PROPOSED // Begin: LIBERTY GAS STORAGE FACILITY // End: PT NEAR SWD WELL #4 // Status: Authorization Granted - Special Conditions
P20080450	LA STORAGE LLC - GAS PIPELINE // 36" // 5' BLW ML // PROPOSED // Begin: LIBERTY GAS STORAGE FACILITY // End: 42" INTERCONNECT // Status: Authorization Granted - Special Conditions
P20080450	LIBERTY GAS STORAGE EXPANSION
P20080450	SWD WELL #1
P20080450	SWD WELL #2
P20080450	SWD WELL #3
P20080450	SWD WELL #4
P20080687	LEVEE REPAIR - SECONDARY UNIT
P20080687	MARSH MANAGEMENT - TERRACES; PRIMARY & SECONDARY
P20080687	RYCADE CANAL HYDROLOGIC PROJECT: MARCANTEL LEVEE
P20090746	TERRACES
P20100182	WELL LOCATION & STRS: SL 42 #227
P20100299	TEXAS PETROLEUM INVESTMENT COMPANY - PIPELINE // 3" // 3.5' MAX BLW ML // ACTIVE // Begin: SL 42 WELL NO 227 // End: EXISTING PRODUCTION FACILITY // Status: Authorization Granted - Special Conditions
P20100398	CAMERON LNG, LLC - DISCHARGE PIPES - TEMPORARY // 30" // TEMPORARY // Begin: // End: // Status: Authorization Granted - Special Conditions
P20100398	MAINTENANCE DREDGE AREA - ADDITIONAL
P20100398	MAINTENANCE DREDGING
P20100398	RETAINING LEVEE AREA A3 (OPTION 1)
P20100398	SPOIL PLACEMENT AREA A1 (OPTION 1 & 2)
P20100398	SPOIL PLACEMENT AREA A2 (OPTION 1 & 2)
P20100398	SPOIL PLACEMENT AREA A3 (OPTION 1 & 2)
P20100398	SPOIL PLACEMENT AREA B1 (OPTION 1 & 2)
P20101174	TEXAS PETROLEUM INVESTMENT COMPANY - FLOWLINE // 4" // 4' MIN BLW ML // PROPOSED // Begin: SEPARATOR PLATFORM // End: PIPELINE RACK // Status: Authorization Granted - Special Conditions
P20101301	DREDGE @ HILCORP 15 WELL #1
P20101301	HILCORP 15 WELL #1 & STRUCTURES
P20101301	SPOIL PLACEMENT @ ELEV TO MARSH EST

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

CUPING	DESCRIPTION
P20101301	THREE PILE CLUSTERS (3) 40' APART
P20110185	BANK STABILIZATION
P20110352	GULFPORT ENERGY CORPORATION - PIPELINE // 4" // LAID ON MARSH & 3' BLW ML // PROPOSED // Begin: HILCORP FEE 15 WELL NO 1 // End: PROPOSED PLATFORM // Status: Authorization Granted - Special Conditions
P20110352	PLATFORM: 12' X 24'
P20110352	PLATFORM: 20' X 20'
P20110636	DREDGING
P20110636	SPOIL PLACEMENT
P20110636	WELL LOCATION: HILCORP 14 NO 1
P20111535	DREDGING
P20111535	SPOIL PLACEMENT
P20111535	WELL LOCATION: HILCORP 14 NO 2 (NO NEW STRS)
P20111535	WELL LOCATION: HILCORP 14 NO 3 (NO NEW STRS)
P20111655	GULFPORT ENERGY CORPORATION - FLOWLINE // (2) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: EXISTING FLOWLINE // End: PROPOSED HEADER PLATFROM // Status: Authorization Granted - Special Conditions
P20111655	GULFPORT ENERGY CORPORATION - FLOWLINE // (3) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: HILCORP FEE WELL NO. 1 // End: PROPOSED HEADER PLATFORM // Status: Authorization Granted - Special Conditions
P20111655	GULFPORT ENERGY CORPORATION - FLOWLINE // (4) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: PROPOSED HEADER PLATFORM // End: PROPOSED TANK BATTERY // Status: Authorization Granted - Special Conditions
P20111655	HEADER PLATFORM
P20111655	TANK BATTERY
P20111660	GULFPORT ENERGY CORPORATION - FLOWLINE // 6" // 3' MIN BLW ML // PROPOSED // Begin: EXISTING TANK BATTERY // End: EXISTING FACILITY // Status: Authorization Granted - Special Conditions
P20120195	DREDGE SLIP & SPOIL PLACEMENT
P20120231	DREDGING
P20120231	SPOIL
P20120233	DREDGING
P20120233	LOCATION HILCORP 14 WELL NO 2 & 3
P20120233	SPOIL
P20120850	WELL LOCATION & STRS: HILCORP FEE 15 NO 2
P20120900	POWER POLE INSTALLATION
P20120916	BANK STABILIZAITON
P20120916	DREDGING
P20120916	LOCATION HILCORP FEE 14 WELL NO 4
P20120916	SPOIL
P20120916	SPOIL PLACEMENT (10' X 41')
P20120916	UNAUTHORIZED FILL: 32' X 42'

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

CASE NUMBER	DESCRIPTION
P20120941	DREDGING - SUCTION
P20120941	HILCORP FEE 14 WELL NO 5
P20120941	SPOIL
P20120952	DREDGE SLIP
P20120952	SPOIL PLACEMENT
P20120952	WELL LOCATION: HILCORP FEE 15 NO 3
P20121073	ENTERGY SUBSTATION
P20121073	L428 TRANSMISSION LINE STUDY AREA
P20130413	MONITORING WELL A1-MW10
P20130413	MONITORING WELL A1-MW13
P20130413	MONITORING WELL A1-MW15
P20130413	MONITORING WELL A1-MW16
P20130413	MONITORING WELL A1-MW17
P20130413	MONITORING WELL A1-MW2
P20130413	MONITORING WELL A1-MW3
P20130413	MONITORING WELL A1-MW4
P20130413	MONITORING WELL A1-MW5
P20130413	MONITORING WELL A1-MW6
P20130413	MONITORING WELL A1-MW7
P20130413	MONITORING WELL A1-MW8
P20130413	MONITORING WELL A2-MW1
P20130413	MONITORING WELL A2-MW10
P20130413	MONITORING WELL A2-MW11
P20130413	MONITORING WELL A2-MW12
P20130413	MONITORING WELL A2-MW13
P20130413	MONITORING WELL A2-MW14
P20130413	MONITORING WELL A2-MW15
P20130413	MONITORING WELL A2-MW16
P20130413	MONITORING WELL A2-MW17
P20130413	MONITORING WELL A2-MW18
P20130413	MONITORING WELL A2-MW19
P20130413	MONITORING WELL A2-MW2
P20130413	MONITORING WELL A2-MW20
P20130413	MONITORING WELL A2-MW21
P20130413	MONITORING WELL A2-MW22
P20130413	MONITORING WELL A2-MW23
P20130413	MONITORING WELL A2-MW24
P20130413	MONITORING WELL A2-MW25
P20130413	MONITORING WELL A2-MW26
P20130413	MONITORING WELL A2-MW27
P20130413	MONITORING WELL A2-MW28
P20130413	MONITORING WELL A2-MW29

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

CUPING	Description
P20130413	MONITORING WELL A2-MW3
P20130413	MONITORING WELL A2-MW4
P20130413	MONITORING WELL A2-MW5
P20130413	MONITORING WELL A2-MW6
P20130413	MONITORING WELL A2-MW7
P20130413	MONITORING WELL A2-MW8
P20130413	MONITORING WELL A2-MW9
P20130413	MONITORING WELL A3-MW1
P20130413	MONITORING WELL A3-MW10
P20130413	MONITORING WELL A3-MW11
P20130413	MONITORING WELL A3-MW12
P20130413	MONITORING WELL A3-MW13
P20130413	MONITORING WELL A3-MW2
P20130413	MONITORING WELL A3-MW3
P20130413	MONITORING WELL A3-MW4
P20130413	MONITORING WELL A3-MW5
P20130413	MONITORING WELL A3-MW6
P20130413	MONITORING WELL A3-MW7
P20130413	MONITORING WELL A3-MW8
P20130413	MONITORING WELL A3-MW9
P20130413	MONITORING WELL A4-MW1
P20130413	MONITORING WELL A4-MW2
P20130413	MONITORING WELL A4-MW3
P20130413	MONITORING WELL A4-MW5
P20130413	MONITORING WELL A4-MW7
P20130413	MONITORING WELL A5-MW1
P20130413	MONITORING WELL A5-MW10
P20130413	MONITORING WELL A5-MW11
P20130413	MONITORING WELL A5-MW12
P20130413	MONITORING WELL A5-MW13
P20130413	MONITORING WELL A5-MW14
P20130413	MONITORING WELL A5-MW2
P20130413	MONITORING WELL A5-MW3
P20130413	MONITORING WELL A5-MW4
P20130413	MONITORING WELL A5-MW5
P20130413	MONITORING WELL A5-MW6
P20130413	MONITORING WELL A5-MW7
P20130413	MONITORING WELL A5-MW8
P20130413	MONITORING WELL A5-MW9
P20130413	SAMPLING AREA 1
P20130413	SAMPLING AREA 2
P20130413	SAMPLING AREA 3

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

PERMIT NUMBER	DESCRIPTION
P20130413	SAMPLING AREA 4
P20130413	SAMPLING AREA 5
P20130413	SOIL BORING A1-SB10
P20130413	SOIL BORING A1-SB2
P20130413	SOIL BORING A1-SB3
P20130413	SOIL BORING A1-SB5
P20130413	SOIL BORING A1-SB6
P20130413	SOIL BORING A1-SB7
P20130413	SOIL BORING A1-SB9
P20130413	SOIL BORING A2-SB1
P20130413	SOIL BORING A2-SB10
P20130413	SOIL BORING A2-SB11
P20130413	SOIL BORING A2-SB12
P20130413	SOIL BORING A2-SB13
P20130413	SOIL BORING A2-SB14
P20130413	SOIL BORING A2-SB15
P20130413	SOIL BORING A2-SB16
P20130413	SOIL BORING A2-SB17
P20130413	SOIL BORING A2-SB18
P20130413	SOIL BORING A2-SB19
P20130413	SOIL BORING A2-SB2
P20130413	SOIL BORING A2-SB20
P20130413	SOIL BORING A2-SB21
P20130413	SOIL BORING A2-SB22
P20130413	SOIL BORING A2-SB23
P20130413	SOIL BORING A2-SB24
P20130413	SOIL BORING A2-SB25
P20130413	SOIL BORING A2-SB26
P20130413	SOIL BORING A2-SB27
P20130413	SOIL BORING A2-SB28
P20130413	SOIL BORING A2-SB29
P20130413	SOIL BORING A2-SB3
P20130413	SOIL BORING A2-SB30
P20130413	SOIL BORING A2-SB4
P20130413	SOIL BORING A2-SB5
P20130413	SOIL BORING A2-SB6
P20130413	SOIL BORING A2-SB7
P20130413	SOIL BORING A2-SB8
P20130413	SOIL BORING A2-SB9
P20130413	SOIL BORING A3-SB1
P20130413	SOIL BORING A3-SB10
P20130413	SOIL BORING A3-SB11

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

PUR No	Description
P20130413	SOIL BORING A3-SB12
P20130413	SOIL BORING A3-SB13
P20130413	SOIL BORING A3-SB14
P20130413	SOIL BORING A3-SB2
P20130413	SOIL BORING A3-SB3
P20130413	SOIL BORING A3-SB4
P20130413	SOIL BORING A3-SB5
P20130413	SOIL BORING A3-SB6
P20130413	SOIL BORING A3-SB7
P20130413	SOIL BORING A3-SB8
P20130413	SOIL BORING A3-SB9
P20130413	SOIL BORING A4-SB1
P20130413	SOIL BORING A4-SB11
P20130413	SOIL BORING A4-SB2
P20130413	SOIL BORING A4-SB3
P20130413	SOIL BORING A4-SB4
P20130413	SOIL BORING A4-SB5
P20130413	SOIL BORING A4-SB6
P20130413	SOIL BORING A4-SB7
P20130413	SOIL BORING A4-SB8
P20130413	SOIL BORING A5-SB1
P20130413	SOIL BORING A5-SB10
P20130413	SOIL BORING A5-SB11
P20130413	SOIL BORING A5-SB12
P20130413	SOIL BORING A5-SB13
P20130413	SOIL BORING A5-SB14
P20130413	SOIL BORING A5-SB15
P20130413	SOIL BORING A5-SB16
P20130413	SOIL BORING A5-SB2
P20130413	SOIL BORING A5-SB3
P20130413	SOIL BORING A5-SB4
P20130413	SOIL BORING A5-SB5
P20130413	SOIL BORING A5-SB6
P20130413	SOIL BORING A5-SB7
P20130413	SOIL BORING A5-SB8
P20130413	SOIL BORING A5-SB9
P20130413	STRATIGRAPHIC BORING A1-DB
P20130413	STRATIGRAPHIC BORING A2-DB
P20130413	STRATIGRAPHIC BORING A3-DB
P20130413	STRATIGRAPHIC BORING A4-DB
P20130413	STRATIGRAPHIC BORING A5-DB
P20130607	SOIL SAMPLE - SITE 1

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EXHIBIT D

Coastal Use Permits for Work in the Operational Area

CLIP NO.	DESCRIPTION
P20130607	SOIL SAMPLE - SITE 2
P20130607	SOIL SAMPLE - SITE 3
P20130760	SAMPLING AREAS
P20130760	SOIL BORING A1-MW1
P20130760	SOIL BORING A1-MW11
P20130760	SOIL BORING A1-MW12
P20130760	SOIL BORING A1-MW14
P20130760	SOIL BORING A1-MW18
P20130760	SOIL BORING A1-MW9
P20130760	SOIL BORING A1-SB1
P20130760	SOIL BORING A1-SB4
P20130760	SOIL BORING A1-SB8
P20130760	SOIL BORING A4-MW4
P20130760	SOIL BORING A4-MW6
P20130760	SOIL BORING A4-SB1
P20130760	SOIL BORING LOCATION A4-SB9
P20131302	WELL LOCATION: HILCORP FEE 15 NO 4
P20131684	PLATFORM: 4'X4'
P20140527	DREDGE & SPOIL PLACEMENT
P20140527	WELL LOCATION: NO 5
P20140534	DREDGE & SPOIL
P20140534	WELL LOCATION & STRS: NO 6

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EXHIBIT E

Map of Oil & Gas Wells within the Operational Area

Orange triangles indicate the surface locations of Oil & Gas Wells. *Source: LDNR*

2015 Aerial



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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

AMOCO PRODUCTION COMPANY

18681	39340	57733
24045	40054	58020
24511	40312	58627
24563	40566	59202
25226	41788	59203
25641	42112	59209
25717	42440	59210
25937	43397	59501
26115	44900	59587
26266	45856	59685
26359	46322	59790
27029	46579	59953
27384	46733	60112
27633	46972	60153
28006	47479	60200
28126	47652	60357
28354	47847	60531
28574	47848	60674
28673	47955	60684
28674	48567	60798
28717	48702	60943
29094	50203	60984
29148	51168	60985
29274	51756	61145
29684	51833	61194
29982	52744	61313
31065	53343	61454
32621	54383	61653
32834	55398	61815
33491	55791	61821
33935	55903	62090
34597	56469	62139
34904	56919	62892
38005	57252	63315
38600	57426	63452
38949	57706	63579

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

63750	92126	99071
64226	92159	108412
64685	92206	108483
65196	92235	109012
65558	92493	111529
66068	92523	112538
66272	92704	112768
66563	92769	113168
67643	92856	113591
69201	93115	113669
72311	93225	113689
73646	93280	114422
82619	93444	114591
83452	94277	115294
83453	94592	116098
83938	95239	116314
84091	95403	116478
84629	95888	116934
84911	96029	117194
85605	96070	117371
85688	96431	118255
86988	96840	118429
88462	96865	119080
88615	97129	119952
89092	97211	120728
89095	97237	121550
89161	97238	121711
89410	97360	123606
90119	97370	123976
90120	97578	124496
90344	97869	124530
90660	98039	124665
91064	98040	124684
91167	98080	124924
91202	98329	125138
91255	98389	125298
91452	98622	125299
91453	98844	125634

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

126159	142534	172742
126498	142834	173268
126712	142856	173594
127058	142914	174468
127602	142964	175290
128155	143372	177772
128327	143886	178320
128622	143969	178483
128808	144231	178645
129447	145226	183533
129448	148403	183534
129916	150134	185811
130261	150516	186293
130422	150517	186294
131712	152337	186502
131821	153378	186759
131887	153379	186760
132291	153860	186771
132480	154033	187289
133057	154167	187566
133091	154592	187567
133092	158315	187739
133886	161709	187740
134261	162753	188164
134396	162955	188165
134711	163628	188166
134786	164401	189610
135141	164402	190572
135845	165098	191110
136113	166574	191111
136545	167099	191112
136570	167671	191302
136645	167914	192500
138965	168405	192895
139286	168406	192896
142098	169201	192897
142375	169738	192898
142493	169850	194525

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

195488	202042	205577
195517	202778	205578
195924	202781	205704
196191	202851	205715
197220	203007	205880
198098	203024	205881
198193	203369	205882
198438	203530	206002
198858	203692	206003
198859	203782	206478
199342	203999	206669
199343	204139	206805
199344	204140	207200
199598	204232	207286
199923	204350	208085
199957	204488	208086
200015	204626	208087
200016	204819	212565
200017	204820	213874
200314	204872	213875
200955	205174	217425
201239	205245	218111
201896	205413	221245
201923	205463	221710
202041	205576	

APACHE CORPORATION

92770

BP AMERICA PRODUCTION COMPANY

125636

CHEVRON OIL COMPANY

91028

CHEVRON U.S.A. INC.

86170	87032	87118
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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

87585	90100	94863
87634	91028	95710
88335	91613	137665
88397	92349	147993
89276	92754	180771
89378	93995	212754

DARSEY OPERATING CORPORATION

183066

ENERVEST OPERATING, L.L.C.

28850 89097

FREEPORT SULPHUR CO.

28274 30191

GULF OIL CORP.

29149	88397	93995
86170	89276	94863
87032	89378	95710
87118	90100	137665
87585	91613	147993
87634	92349	180771
88335	92754	

GULF REFG CO

29149 88922

GULFPORT ENERGY CORPORATION

86170	94863	243534
87032	95710	244693
87585	147993	245542
87634	180771	245640
88335	183066	245932
88397	187955	247014
89276	212754	247099
89378	242651	

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

HILCORP ENERGY COMPANY

25717	91255	192895
25937	91453	192897
29148	92856	192898
31065	118255	194525
32834	120728	198098
39340	125299	199343
46322	125634	199344
46733	127058	199598
47479	130261	199923
47652	131821	200016
47847	133091	200314
47955	136570	200955
48702	142375	201896
52744	142493	202041
55903	144231	202042
58627	158315	203007
59501	164401	203024
59587	164402	203369
59685	167914	203692
59790	173594	203782
59953	174468	204139
60153	175290	204140
60357	178320	204232
60531	178483	204626
60674	185811	204820
60684	186293	204872
60798	186759	205245
60984	187566	205463
60985	187567	205577
61145	187739	205578
61313	188166	205704
62139	189610	205715
65558	190572	206669
66563	191302	207286
69201	192500	208085

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

208086	217425	221710
212565	218111	222050
213874	221245	227397

PAN AMERICAN PETROLEUM CORP.

27633	29274	85967
28239	62893	

PAN AMERICAN PRODUCTION CO.

63960	85967	
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R-5, INC

96653		
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RESOURCE SECURITIES CORP.

183066		
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SAMUEL GARY JR. & ASSOC., INC.

191302	222050	222408
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SHELL OFFSHORE INC.

28716		
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SHELL OIL COMPANY

28716	52744	60674
45040	55903	60684
46322	56569	60798
46733	59587	60984
47479	59684	60985
47652	59685	61098
47847	59953	125634
48702	59954	127058
49943	60153	158315
50619	60154	
51196	60200	

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

SHELL WESTERN E&P INC.

28716

SOUTHERN PETROLEUM COMPANY

86170	88397	147993
87032	89276	180771
87585	89378	212754
87634	94863	215860
88335	95710	

STANOLIND OIL & GAS CO.

27828

STAR ENERGY, INC.

31669 205543

SUN EXPLORATION-PRODUCTION CO.

31669 32569

SUN TEXAS COMPANY

31669 32569

TAYLOR ENERGY CO.

45040	52744	60200
46322	55903	60684
46733	56569	60798
47479	59587	60984
47652	59684	61098
47847	59685	104423
48702	59953	125634
49943	59954	127058
50619	60153	158315
51196	60154	

TEXACO E & P INC.

89097 125636

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

TEXACO, INC.

29296	92236	125636
89097	92770	

TEXAS PACIFIC OIL CO.

13558	32418	121415
26184	32569	
31669	96653	

TEXAS PETROLEUM INVESTMENT COMPANY

25717	60798	173594
25937	60984	174468
29148	60985	175290
31065	61145	178320
32569	61313	178483
32834	62139	185811
39340	65558	186293
46322	66563	186759
46733	69201	187567
47479	91255	187739
47652	91453	188166
47847	92856	189610
47955	118255	191302
48702	120728	192500
52744	125299	192895
55903	125634	192897
58627	127058	192898
59501	130261	194525
59587	131821	198098
59685	133091	199343
59790	136570	199598
59953	142375	199923
60153	142493	200016
60357	144231	200314
60531	158315	200955
60674	164401	201896
60684	164402	202042

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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

203007	204872	208086
203024	205245	212565
203369	205463	213874
203692	205577	217425
203782	205578	218111
204139	205704	221245
204140	205715	221710
204232	206669	222050
204626	207286	227397
204820	208085	241105

THE CALIFORNIA COMPANY

35814	104655	109012
91028	108412	
104423	108483	

THE SUPERIOR OIL COMPANY

59684

THE TEXAS COMPANY

28850	89097	92770
29296	92236	125636

THE UNION SULPHUR COMPANY

33354	91028	
33355	96653	

TRANSCONTINENTAL OIL CORP.

183065	183066	
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UNION OIL & GAS CORP OF LA

32168	96653	
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VASTAR RESOURCES INC.

125636

VERNON E. FAULCONER, INC.

31669	32569	189892
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EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

WRT ENERGY CORPORATION 86170

87032	89276	180771
87585	89378	183066
87634	94863	187955
88335	95710	212754
88397	147993	

YOUNT-LEE OIL COMPANY

15026

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688 and
Part G, §13, Louisiana Supreme Court General Administrative Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

The Parish of Cameron

vs. Auster Oil and Gas, Inc.

Court: 38th JDC

Docket Number: _____

2016 FEB

RECEIVED
CLERK OF COURT
CAMERON PARISH, LA.
FILED

Parish of Filing: Cameron

Filing Date: 2-4-17

Name of Lead Petitioner's Attorney: John H. Carmouche

4-5pm 4-20

Name of Self-Represented Litigant: _____

Number of named petitioners: 2

Number of named defendants: 26

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- | | |
|---|--|
| <input type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | <input checked="" type="checkbox"/> Enforcement of State Coastal Statutes and State Regulations and Local Coastal Regulations and/or Ordinances. |
| <input type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:

ENFORCEMENT OF STATE COASTAL STATUTES AND STATE REGULATIONS AND LOCAL COASTAL REGULATIONS AND/OR ORDINANCES

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name John H. Carmouche

Signature John H. Carmouche

Address 17405 Perkins Road, Baton Rouge, LA 70810

Phone number: 225-400-9991

E-mail address: jcarmouche@tcmlawfirm.net

THIRTY EIGHTH JUDICIAL DISTRICT COURT

PARISH OF CAMERON

STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

RECEIVED & FILED
2016 MAR 14 PM 4 03

CLERK OF COURT
CAMERON PARISH, LA.

DATE FILED: _____ DEPUTY CLERK: _____

PETITION FOR INTERVENTION

NOW INTO COURT, through undersigned counsel, comes THE STATE OF LOUISIANA, EX REL. JEFF LANDRY, ATTORNEY GENERAL, who respectfully intervenes in this action to protect and enforce the rights of the citizens of the State of Louisiana to a sustainable coastal zone:

1.

The Parish of Cameron (hereinafter "the Parish") has alleged violations of the Louisiana Coastal Resources Management Act of 1978, as amended (La. R.S. 214.21, *et seq.*, hereinafter, "the LCR") in Cameron Parish as a result of activities by the defendants. The Parish has filed this action to seek restoration of property and damages.

2.

Counsel for the Parish filed the original Petition "on its own behalf and in the name of the State of Louisiana" notwithstanding the fact that there is no contract between counsel and any State agency or State official authorized to represent the State of Louisiana. This purported co-representation was done under the Parish's interpretation of La. R.S. 49:214.36, which it believed authorized such a filing.

3.

On December 1, 2014, following removal of a nearly identical suit from Plaquemines Parish to federal court, Judge Jay C. Zainey agreed with Plaquemines Parish's interpretation that

the State of Louisiana was a real party in interest and that the Parish was authorized to sue in matters such as this under La. R.S. 49:214.36(D) *on behalf of* the State of Louisiana.¹

4.

The Attorney General of the State of Louisiana files this Petition for Intervention as authorized by La. R.S. 49:214.36(D) and in accordance with his authority under Art. IV, Section. 8, of the Louisiana Constitution to intervene in any lawsuit and supersede the attorneys in representing the interests of the State of Louisiana, more specifically, "as necessary for the assertion or protection of any right or interest of the state, the attorney general shall have the authority (1) to institute, prosecute, or intervene in any civil action or proceeding.

5.

The Attorney General, as the Chief Legal Officer of the State, has an overriding obligation to protect the interests of the State as a whole. This matter raises issues that have policy and legal implications that are far reaching and necessitate representation by the State's Chief Legal Officer.

6.

By filing this Petition, the State of Louisiana is not adopting the Parish's reasoning, nor Judge Zainey's dicta in the Plaquemines Parish suit regarding co-representation. However, to ensure that no State claims are encumbered absent the presence of the State's Chief Legal Officer, the Attorney General hereby seeks intervention.

7.

In addition to protecting the litigious rights provided by La. R.S.49:214.36(D), the State intervenes to enforce the contents of the LCR and to ensure that any and all unpermitted and unmitigated damage to the coastal zone is remediated and restored in accordance with the Constitution of the State of Louisiana and applicable laws and regulations administered by the Louisiana Department of Natural Resources, the Coastal Protection and Restoration Authority, the Attorney General, and any other agencies and political subdivisions of the State.

8.

In the alternative, the State intervenes under the authority of the Public Trust Doctrine, Louisiana Constitution Article IX, Section 1, which provides, in pertinent part,

¹ Judge Zainey's adoption of the Parish's reasoning on the purported representation of the State of Louisiana was dicta as the analysis followed his proclamation that "[t]he Court's ruling on the egregious misjoinder issue renders moot the question whether the claims on behalf of the State destroy diversity jurisdiction. For completeness, the Court nonetheless will address this potential impediment to diversity jurisdiction." *Plaquemines v. Total Petrochemical & Refining USA, INC. et al.*, 64 F.Supp.3d. 872, 887 (E.D.La. 2014).

The natural resources of the state, including the air and water, and the healthful, scenic, historic, and esthetic quality of the environment shall be protected, conserved, and replenished insofar as possible and consistent with the health, safety, and welfare of the people. The legislature shall enact laws to implement this policy.

9.

Further, the Attorney General intervenes pursuant to Article 1091 of the Louisiana Code of Civil Procedure in that the Attorney General, as the State's chief legal officer, has the authority and responsibility to bring a *parens patriae* action to protect and preserve the State's natural resources and the environment.

10.

An intervention is defined by La. C.C.P. Art. 1031 as an incidental demand and, because no answer has been filed in this case, La. C.C.P. Art. 1033 provides that the State may intervene without leave of court.

11.

Pursuant to the aforementioned authority, the State of Louisiana, *ex rel.* Attorney General Jeff Landry, asserts its jurisdiction over all claims originally asserted by the Parish of Cameron and hereby supersedes said claims as though made by the State through the Attorney General in the first instance.

12.

The State's claims track closely to those claims asserted by the Parish under La. R.S. 49:214.36 for dredging activities contributing to the degradation of property in the coastal zone. However, the State makes no claims related to waste pits, the release of contaminants, pollutants, waste leachate, and toxic substances as put forth by the Parish.

13.

The State's claims are limited to the Defendants' oil and gas activities that resulted in the dredging of numerous canals in Cameron Parish as originally detailed in Paragraphs 25-33 of the Parish's Petition.

14.

In sum, the State of Louisiana, through the Attorney General, seeks to intervene in this suit to protect the State's independent litigious rights under La. R.S. 49:214.36, which may be interpreted as being encumbered by the Parish's current posture in this case and by previous rulings of the United States District Court for the Eastern District of Louisiana. For that reason,

the State, through the Attorney General, herein and hereby asserts as its own the Parish's claims in this matter under La. R.S. 49:214.36.

15.

The State of Louisiana asserts the right to recover all civil penalties, damages, payments of restorations costs, actual restoration of the disturbed areas, and other reasonable and proper sanctions for uses conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit.

16.

The State of Louisiana further asserts the right to recover costs and attorney fees from any party found to be responsible.

17.

The State of Louisiana also reserves the right to seek injunctive relief, specific performance, and any other applicable remedies or equitable or relief permitted by law.

WHEREFORE, THE STATE OF LOUISIANA, *EX REL.* JEFF LANDRY, ATTORNEY GENERAL, prays:

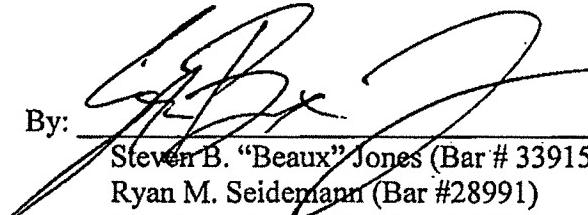
- (1) that judgment be rendered in favor of Intervenor and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit in accordance with La. R.S. 49:214.21, *et seq.*;
- (2) that, alternatively, judgment be rendered in favor of Intervenor on behalf of the State in its capacity as public trustee or as *parens patriae*, and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit;
- (3) that judgment be rendered in favor of the Attorney General, the Chief Legal Office of the State, to supersede the Parish's attorneys.

- (4) that judgment be rendered in favor of Intervenor and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit, for damages, reasonable costs and attorney fees incurred by or on behalf of the State in responding to such activities and enforcing the State's rights;
- (5) that Defendants be ordered to restore the Cameron Parish Coastal Zone to its original condition or make payments for such restoration costs.;
- (6) such other and further relief available, subject to any limitations set forth in the petition.
- (7) The State of Louisiana requests trial by jury.

Intervenor further prays for all costs of these proceedings, for all necessary orders and decrees as may be required or proper in the premises and for full, general, and equitable relief.

Respectfully submitted:

**JEFF LANDRY
ATTORNEY GENERAL**

By: 

Steven B. "Beaux" Jones (Bar # 33915)
Ryan M. Seidemann (Bar #28991)
Elizabeth B. Murrill (Bar #20685)
Wilbur L. Stiles, III (Bar #27654)
Assistant Attorneys General
Louisiana Department of Justice
1185 North 3rd Street
Baton Rouge, Louisiana 70802
Telephone No.: (225) 326-6085
Facsimile: (225) 326-6099
Attorneys for the State of Louisiana

SHERIFF: PLEASE WITHHOLD SERVICE

THIRTY EIGHTH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON
VS
AUSTER OIL & GAS, INC., ET AL.

CLERK OF COURT
CAMERON PARISH, LA.

2016 MAR 14 PM 4 05

RECEIVED & FILED

FILED

DEPUTY CLERK

ORDER

Considering the above and foregoing Petition for Intervention filed by THE STATE OF LOUISIANA, EX REL. JEFF LANDRY, ATTORNEY GENERAL;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the State of Louisiana's Petition for Intervention is hereby granted for the Attorney General to supersede the Plaintiff's claims in this matter on behalf of the State of Louisiana in this case.

Cameron, Louisiana, this 17th day of March, 2016.

Penelope Richard
HONORABLE PENELOPE RICHARD
JUDGE, 38th JUDICIAL DISTRICT COURT

THIRTY EIGHTH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

2016 MAR 14 PM 4 05

CLERK OF COURT
CAMERON PARISH, LA.

RECEIVED & FILED

FILED:

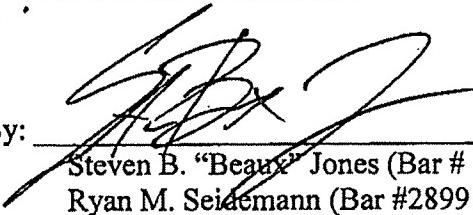
DEPUTY CLERK

REQUEST FOR NOTICE

THE STATE OF LOUISIANA, *ex rel.* JEFF LANDRY., ATTORNEY GENERAL, respectfully requests written notice of the trial date, hearings (whether on the merits or otherwise), orders, judgments, and interlocutory decrees, and any and all other matters as provided in the Louisiana Code of Civil Procedure articles 1572, 1913, and 1914.

Respectfully submitted:

JEFF LANDRY
ATTORNEY GENERAL

By: 

Steven B. "Beaux" Jones (Bar # 33915)
Ryan M. Seidemann (Bar #28991)
Elizabeth B. Murrill (Bar #20685)
Wilbur L. Stiles, III (Bar #27654)
Assistant Attorneys General
Louisiana Department of Justice
1185 North 3rd Street
Baton Rouge, Louisiana 70802
Telephone No.: (225) 326-6085
Facsimile: (225) 326-6099
Attorneys for the State of Louisiana



Jeff Landry
Attorney General

State of Louisiana

DEPARTMENT OF JUSTICE
CIVIL DIVISION
P.O. BOX 94005
BATON ROUGE
70804-9005

March 28, 2016

Honorable Carl E. Broussard
Clerk of Court
Cameron Parish, 38th JDC
P.O. Box 549
Cameron, LA 70631

By US Mail

Re: Parish of Cameron v. BEPCO, L.P., et al., No.10-19572
Parish of Cameron v. Brammer Engineering, Inc., et al., No.10-19573
Parish of Cameron v. Ballard Exploration Co., et al., No.10-19574
Parish of Cameron v. Burlington Resources Oil and Gas Co., et al., No.10-19575
Parish of Cameron v. BP America Production Co., et al., No.10-19576
Parish of Cameron v. Atlantic Richfield Co., et al., No.10-19577
Parish of Cameron v. Anadarko E&P Onshore LLC, et al., No.10-19578
Parish of Cameron v. Apache Corporation of Delaware, et al., No.10-19579
Parish of Cameron v. Alpine Exploration, Inc. et al., No.10-19580
Parish of Cameron v. Bay Coquille, Inc., et al., No.10-19581
~~Parish of Cameron v. Auster Oil & Gas, et al., No.10-19582~~

Dear Sir:

I am enclosing herewith an original and one (1) copy of the State's Proposed Order to Vacate Judge Richard's Order to be filed in the above-referenced matters. Please file the original into the record and return a date-stamped copy for my files in the enclosed self-addressed, postage-prepaid envelope. If you have any questions regarding this matter, please feel free to contact me at (225) 326-6085. Thank you in advance for your courtesies. Inasmuch as this request is being made on behalf of the State of Louisiana, no court costs are due.

Sincerely,

JEFF LANDRY
ATTORNEY GENERAL

By:
Steven B. "Beaux" Jones
Assistant Attorney General

JL/SBJ/tp: Enclosures: cc: All known counsel of record

THIRTY EIGHTH JUDICIAL DISTRICT COURT RECEIVED & FILED
2016 MAR 28 PM 2 22
PARISH OF CAMERON
STATE OF LOUISIANA CLERK OF COURT
NO. 10-19582 CAMERON PARISH, LA.

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

DATE FILED: _____

DEPUTY CLERK: _____

RULE TO SHOW CAUSE

MAY IT PLEASE THE COURT:

CONSIDERING the Petition for Intervention and the Attorney General's request to supersede the Parish's Attorneys filed on March 14, 2016, by the State of Louisiana, *ex rel.* Jeff Landry, Attorney General,

IT IS HEREBY ORDERED that pursuant to La. Const. Art. IV § 8, the Attorney General's request to supersede the Parish's Attorneys be and hereby is set for hearing on the 25th day of April 2016, at 10:00 o'clock a.m.

Cameron, Louisiana, this 1st day of April, 2016.

Penelope Richard
Judge Penelope Q. Richard
38th Judicial District Court

4-4 2016
I hereby certify that a copy of the foregoing notice was this day mailed by me to the counsel of record for all parties and to such of the litigants, if any, who are not represented by counsel, which notices were addressed respectively, at their last known address, with postage prepaid.

DR
Dy Clerk of Court

*Steve Jones -
open comanche
Respectfully Submitted,
Chad Mudd
JEFF LANDRY
ATTORNEY GENERAL*

BY: *SB*
Steven B. "Beaux" Jones (#33915)
Assistant Attorney General

PLEASE HOLD SERVICE



Jeff Landry
Attorney General

State of Louisiana

DEPARTMENT OF JUSTICE
CIVIL DIVISION
P.O. BOX 94005
BATON ROUGE
70804-9005

March 23, 2016

Honorable Carl E. Broussard
Clerk of Court
Cameron Parish, 38th JDC
P.O. Box 549
Cameron, LA 70631

By US Mail

Re: Parish of Cameron v. BEPCO, L.P., et al., No.10-19572
Parish of Cameron v. Brammer Engineering, Inc., et al., No.10-19573
Parish of Cameron v. Ballard Exploration Co., et al., No.10-19574
Parish of Cameron v. Burlington Resources Oil and Gas Co., et al., No.10-19575
Parish of Cameron v. BP America Production Co., et al., No.10-19576
Parish of Cameron v. Atlantic Richfield Co., et al., No.10-19577
Parish of Cameron v. Anadarko E&P Onshore LLC, et al., No.10-19578
Parish of Cameron v. Apache Corporation of Delaware, et al., No.10-19579
Parish of Cameron v. Alpine Exploration, Inc. et al., No.10-19580
Parish of Cameron v. Bay Coquille, Inc., et al., No.10-19581
Parish of Cameron v. Auster Oil & Gas, et al., No.10-19582

Dear Sir:

I am enclosing herewith an original and one (1) of a Rule to Show Cause to be filed in the above-referenced matters. Please file the original into the record and return a date-stamped copy for my files in the enclosed self-addressed, postage-prepaid envelope. If you have any questions regarding this matter, please feel free to contact me at (225) 326-6085. Thank you in advance for your courtesies. Inasmuch as this request is being made on behalf of the State of Louisiana, no court costs are due.

Sincerely,

JEFF LANDRY
ATTORNEY GENERAL

By:
Steven B. "Beaux" Jones
Assistant Attorney General

JL/SBJ/tp: Enclosures: cc: All known counsel of record

THIRTY EIGHTH JUDICIAL DISTRICT COURT
RECEIVED & FILED

PARISH OF CAMERON 16 MAR 31 PM 3 27

STATE OF LOUISIANA

CLERK OF COURT

NO. 10-19582

CAMEROON, LOUISIANA

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

DATE FILED: _____

DEPUTY CLERK: _____

ORDER

MAY IT PLEASE THE COURT:

CONSIDERING the request by the State of Louisiana and subsequent filing of a Rule to Show Cause regarding the Attorney General's request to supersede the Parish's Attorney's pursuant to La. Const. Art. IV, §8,

IT IS HEREBY ORDERED that the Court's Ex Parte Order granting the Attorney General's request to supersede is HEREBY VACATED.

Cameron, Louisiana, this 15 day of April, 2016.

Penelope Richard
Judge Penelope Q. Richard
38th Judicial District Court

4-4 2016
I hereby certify that a copy of the foregoing notice was this day mailed by registered mail, postage prepaid, to all parties and their counsel, if any, who are not represented respectively, at their last known address, with postage prepaid.

dp
By Clerk of Court

Respectfully Submitted,

JEFF LANDRY
ATTORNEY GENERAL

BY: *SBJ*
Steven B. "Beaux" Jones (#33915)
Assistant Attorney General

Office of the Governor
State of Louisiana

JOHN BEL EDWARDS
GOVERNOR



P.O. Box 94004
BATON ROUGE, LOUISIANA 70804-9004
(225) 342-7015
GOV.LA.GOV

April 7, 2016

Honorable Cynthia P. King
Clerk of Court - Cameron Parish
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron v. Auster Oil and Gas, Inc., et al.
Number: 10-19582, 38th JDC, Cameron
Our File Number 00060

Dear Ms. King:

Enclosed are an original and one copy of a Petition in Intervention to be filed on behalf of State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris in the above matter.

Please file the original, date-stamp the copy and return it to me in the enclosed self-addressed, stamped envelope. It is my understanding that there are no filing fees due at this time since the filer is a State entity. Please hold service at this time.

If you have any questions, please give me a call (225) 342-8212 or email (sherry.lassere@la.gov). With kindest regards, I remain

Very truly yours,


Sherry G. Lassere, CP
Assistant to Executive Counsel
to the Governor, Matthew F. Block

enclosures

THE PARISH OF CAMERON

NUMBER: 10-19582

VERSUS

RECEIVED & FILED

2016 APR 13 AM 10 41

AUSTER OIL AND GAS, INC., APACHE OIL
CORPORATION, BP AMERICA
PRODUCTION COMPANY, CHEVRON PIPE
LINE COMPANY, CHEVRON U.S.A.
HOLDINGS, INC., CHEVRON U.S.A., INC.,
DARSEY OPERATING CORPORATION,
ENERVEST OPERATING, L.L.C., EXXON
MOBIL CORPORATION, FREEPORT
SULPHUR COMPANY, GULFPORT
ENERGY CORPORATION, HILCORP
ENERGY COMPANY, HONEYWELL
INTERNATIONAL, INC., KERR-MCGEE
OIL AND GAS ONSHORE LP, RESOURCE
SECURITIES CORPORATION, SAMUEL
GARY JR. & ASSOCIATES, INC., SHELL
OFFSHORE, INC., SHELL OIL COMPANY,
STAR ENERGY, INC., SWEP LP, TAYLOR
ENERGY COMPANY LLC, TEXAS PACIFIC
OIL COMPANY, INC., TEXAS PETROLEUM
INVESTMENT COMPANY, THE TEXAS
COMPANY, TRANSCONTINENTAL OIL
CORPORATION AND VERNON E.
FAULCONER, INC.

CLERK OF COURT
CAMERON PARISH, LA.

38TH JUDICIAL DISTRICT COURT

PARISH OF CAMERON

STATE OF LOUISIANA

PETITION IN INTERVENTION OF THE STATE OF LOUISIANA,
THROUGH THE DEPARTMENT OF NATURAL RESOURCES,
OFFICE OF COASTAL MANAGEMENT

NOW INTO COURT, through undersigned counsel, come the State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris, who respectfully represent as follows and request the Court allow this intervention:

1.

Louisiana Code of Civil Procedure article 1091 provides:

A third person having an interest therein may intervene in a pending action to enforce a right related to or connected with the object of the pending action against one or more of the parties thereto by:

- (1) Joining with plaintiff in demanding the same or similar relief against the defendant;
- (2) United with defendant in resisting the plaintiff's demand; or
- (3) Opposing both plaintiff and defendant.

2.

A two-fold inquiry has developed in Louisiana's jurisprudence regarding the requirements for intervention: first, the intervenor must have a justiciable interest in, and a connection to, the principle action. *Palace Props., L.L.C. v. City of Hammond*, (La.App. 1 Cir. 6/27/2003), 859 So.2d 15, 20, *citing Niemann v. American Gulf Shipping, Inc.*, 96-687, p. 6 (La.App. 5 Cir. 1/15/97), 688 So.2d 42, 45, *writ denied* 97-0404, (La. 3/27/97). 692 So.2d 397. The First Circuit, in *Amoco Production Company v.*

Columbia Gas Transmission Corporation, 455 So.2d 1260, 1264 (La.App. 1 Cir. 8/31/1984), defined “justiciable right” in the context of an intervention as “the right of a party to seek redress or a remedy against either plaintiff or defendant in the original action or both....” As to the second inquiry, the court further held that the justiciable right must be “so related or connected to the facts or object of the principal action that a judgment on the principal action will have a direct impact on the intervenor’s rights.” *Id.* As set forth in more detail below, Louisiana law provides the State of Louisiana, through the Louisiana Department of Natural Resources (“DNR”), Office of Coastal Management (“OCM”) with concurrent authority to enforce the provisions of law at issue in the current matter, thereby satisfying the justiciable interest prong. Moreover, that interest is directly connected to the principal action because any judgment issued in that action is subject to the requirements of La. R.S. 49:214.36(O), which requires monies received by a parish be used for integrated coastal protection. Consequently, DNR/OCM has a right to intervene in this proceeding in order to protect the rights of the State pursuant to their respective areas of statutory authority.

3.

Interventions must also be timely, in accordance with La. Code of Civ. Proc. art. 1031 and 1033. As an incidental demand under La. C.C.P. art. 1031, a petition for intervention can be filed without leave of court at any time up to and including the time the answer to the principal demand is filed. It may be filed after an answer, with leave of court, if it will not retard the progress of the principal action. La. C.C.P. art. 1033. The First Circuit Court of Appeal has held that, “[a]n intervention may be filed only while suit is pending and before judgment on the main demand.” *Van Lieu v. Winn-Dixie of Louisiana, Inc.*, 446 So.2d 1362, 1366 (La.App. 1 Cir. 1984). Courts have great discretion in deciding whether to allow an intervention if such intervention will not retard the progress of the main demand. See *Madere v. Lennix*, 535 So.2d 1290 (La.App. 5 Cir. 1988), citing *Volume Shoe Corp. v. Armato*, 341 So.2d 611 (La.App. 2 Cir. 1977).

BACKGROUND

4.

On November 8, 2013, Cameron Parish and the State of Louisiana, *ex rel.* Parish of Cameron filed a Petition for Damages to the Cameron Parish Coastal Zone (the “Petition”) against several oil and gas exploration, production, and transportation operations seeking damages for destruction to coastal land and waterbodies allegedly caused by the Defendants activities. The Plaintiffs specifically seek damages as provided in the State and Local Coastal Resources Management Act of 1978, La. R.S. 49:214.21, *et seq.* (“SLCRMA”), the payment of restoration costs, and actual restoration of the Cameron Parish Coastal Zone.

5.

On December 18, 2013, the Defendants removed the state court action to the federal district court for the Eastern District of Louisiana alleging original jurisdiction based on diversity jurisdiction, Outer Continental Shelf Lands Act, general maritime law, and federal question jurisdiction. The Parish quickly moved to remand the matter back to state court, and on December 1, 2014, the court granted the Parish's motion remanding the matter to state court. No answers have to date been filed in this action.

6.

On March 14, 2016, Attorney General Jeff Landry intervened in this matter, along with all other similar suits seeking recovery under La. R.S. 49:214.21, *et seq.* This intervention by the State of Louisiana through DNR/OCM, in concert with the intervention filed by the Attorney General, ensures that the State of Louisiana's interests will be fully protected in this matter, and that any funds resulting from this litigation will be properly spent on restoring Louisiana's coast.

LEGAL FRAMEWORK

7.

The Louisiana Department of Natural Resources ("DNR") is an executive branch agency of the state and is responsible for the conservation, management, and development of water, minerals, and other such natural resources of the state, including coastal management. La. R.S. 36:351(A). The Office of Coastal Management is created within DNR and is charged with performing the functions of the state relative to the coastal zone management program. La. R.S. 36:358; *see also* La. R.S. 49:214.26 (establishing a coastal zone program within DNR and authorizing the Secretary of DNR or his designee to administer the program).

8.

Louisiana Constitution Article IX, Section 1 provides, in pertinent part:

The natural resources of the state, including the air and water, and the healthful, scenic, historic, and esthetic quality of the environment shall be protected, conserved, and replenished insofar as possible and consistent with the health, safety, and welfare of the people. The legislature shall enact laws to implement this policy.

9.

The Louisiana Legislature, in 1978, enacted the State and Local Coastal Resources Management Act ("SLCRMA") (Act 361 of 1978, codified at La. R.S. 49:214.21, *et seq.*) (*i.e.* the Louisiana Coastal Zone Management Program), in order to balance conservation and development within Louisiana's coastal zone. SLCRMA is one of the public trust laws enacted by the legislature pursuant to La. Const. art. IX, sec. 1.

10.

In August 1980, Louisiana's coastal management program, the Louisiana Coastal Resources Program ("LCRP"), was approved by the National Oceanic and Atmospheric Administration ("NOAA"), U.S. Department of Commerce, under section 306 of the Coastal Zone Management Act (16 U.S.C. § 1455(d)).

11.

Pursuant to the SLCRMA, in 1980, DNR adopted, and the legislature and the governor approved, the Louisiana Coastal Use Guidelines. *See LAC 43:I.701-719.* The enforceable policies of the LCRP, as approved by NOAA, include, but are not limited to, the 94 Coastal Use Guidelines adopted by the State, as well as Article IX, Section 1 of the Louisiana Constitution.

12.

In enacting SLCRMA, the legislature declared that it was the public policy of the State:

- (1) To protect, develop, and, where feasible, restore or enhance the resources of the state's coastal zone.

- ***
- (5) To develop and implement a coastal resources management program which is based on consideration of our resources, the environment, the needs of the people of the state, the nation, and of state and local government.
- (6) To enhance opportunities for the use and enjoyment of the recreational values of the coastal zone.
- (7) To develop and implement a reasonable and equitable coastal resources management program with sufficient expertise, technical proficiency, and legal authority to enable Louisiana to determine the future course of development and conservation of the coastal zone and to ensure that state and local governments have the primary authority for managing coastal resources.
- (8) To support sustainable development in the coastal zone that accounts for potential impacts from hurricanes and other natural disasters and avoids environmental degradation resulting from damage to infrastructure caused by natural disasters.

La. R.S. 49:214.22.

13.

Under the SLCRMA, there are two types of coastal uses: uses of State concern and uses of local concern. Uses of State concern are those uses that directly and significantly affect coastal waters and which are in need of coastal management and which have impacts of greater than local significance or which significantly affect interest of regional, state, or national concern. La. R.S. 49:214.25. Prior to commencing a use of the coastal zone, an applicant must first apply for and receive a coastal use permit ("CUP"). La. R.S. 49:214.30. The secretary of DNR ("Secretary") is designated to make decisions on coastal use permit applications for uses of State concern, whereas the local government makes decisions

as to uses of local concern in areas where an approved local program is in effect. Prior to issuing a CUP, the Secretary must ensure that the activity for which the application is being made is consistent with the State's Comprehensive Master Plan for Integrated Coastal Protection ("Master Plan") and with the Coastal Use Guidelines. *Id.* See also LAC: 43.I.701, *et seq.*

14.

DNR/OCM is given specific, non-exclusive authority to enforce SLCRMA and the LCRP. La. R.S. 49:214.36(D) provides that the Secretary "may bring such injunctive, declaratory, or other actions as are necessary to ensure that no uses are made of the coastal zone for which a CUP has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit." According to La. R.S. 49:214.36(E), "[a] court may impose civil liability and assess damages; order, where feasible and practical, the payment of restoration costs; require, where feasible and practical, actual restoration of the areas disturbed; or otherwise impose reasonable and proper sanctions for uses conducted within the coastal zone...[t]he court may also award costs and attorney's fees to the prevailing party."

15.

Act No. 544 of the 2014 Regular Session of the Louisiana Legislature ("Act 544") added subsection (O) to La. R.S. 49:214.36 to provide that the only state or local governmental entity rights or causes of action arising from any activity subject to the permitting of SLCRMA are those outlined in that law. Act 544 further provided that "[a]ny monies received by any state or local governmental entity arising from or related to a state or federal permit issued pursuant to R.S. 49:214.21, *et seq.* ... a violation thereof, or enforcement thereof, or for damages or other relief arising from or related to...shall be used for integrated coastal protection, including coastal restoration, hurricane protection, and improving the resiliency of the coastal area." Act 544 applies to all claims existing or pending on the effective date of the Act, which was June 6, 2014.

16.

"Integrated coastal protection" is not defined in SLCRMA; however, it is defined in La. R.S. 49:214.2, as follows:

"Integrated coastal protection" means plans, projects, policies, and programs intended to provide hurricane protection or coastal conservation or restoration, and shall include but not be limited to coastal restoration; coastal protection; infrastructure; storm damage reduction; flood control; water resources development; erosion control measures; marsh management; diversions; saltwater intrusion prevention; wetlands and central wetlands conservation, enhancement, and restoration; barrier island and shoreline stabilization and preservation; coastal passes stabilization and restoration; mitigation; storm surge reduction; or beneficial use projects.

17.

Many of the activities asserted by Cameron Parish in its Petition to have caused the damages alleged are included within the list of activities for which a coastal use permit must be issued, including, but not limited to: (1) dredge and fill activity which intersects with more than one water body; (2) all mineral activities, including exploration for and production of, oil, gas, and other minerals, all dredge and fill uses associated therewith, and all other associated uses; and, (3) all pipelines for the gathering, transportation or transmission of oil, gas, and other materials. *See La. R.S. 49:214.25(A); see also Plaintiff's Petition, ¶ 19 – 25.*

18.

The Parish has specifically included a list of the coastal use permits known to have been issued within the area of the complained-of activity that forms the basis of the lawsuit. *See Plaintiff's Petition, ¶ 7 and Exhibit D.*

19.

Cameron Parish has prayed for damages, restoration costs, and actual restoration in areas of the coastal zone subject to SLCRMA. As such, DNR's authority to enforce SLCRMA and seek the payment of restoration costs or require actual restoration of areas disturbed overlaps with the relief requested by Parish. More importantly, Act 544 requires that any monies received by a local governmental entity arising from or related to a coastal use permit, the enforcement of SLCRMA, or related to any use of the coastal zone subject to SLCRMA be used for integrated coastal protection. Thus, intervention is necessary to ensure that the State of Louisiana's interests, through the statutory authority of DNR/OCM, are fully protected and that in the event that the Parish is awarded any damages or other relief, restoration is achieved in a manner consistent with state law, including but not limited to Part II of Title 49 of the Louisiana Revised Statutes – Louisiana Coastal Protection, Conservation, Restoration, and Management.

20.

The legislature gave both DNR and local governmental entities with approved local coastal management programs the authority to enforce SLCRMA with respect to coastal use permits issued by those entities, as well as for uses for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of such permit. La. R.S. 49:214.36.

21.

Likewise, the legislature also provided for the mission of the state as it relates to integrated coastal protection, stating:

The state must act to develop, implement, and enforce a comprehensive integrated coastal protection plan. The state must act to ensure that the plan incorporates a systems approach to integrate hurricane protection and coastal restoration efforts in order to achieve long-term and comprehensive integrated coastal protection. Comprehensive integrated coastal protection must proceed in a manner that recognizes that the proper functioning of each protective element is critical to the overall success of the plan and that without such proper functioning the safety of the state and its citizens and the viability of the entire plan are threatened. Further, comprehensive integrated coastal protection must proceed in a manner that recognizes the powers and duties of political subdivisions, including flood protection authorities, and levee districts, to fund and manage local activities that are consistent with the goals of a comprehensive integrated coastal protection plan. The state must act to conserve, restore, create, and enhance wetlands and barrier shorelines or reefs in coastal Louisiana while encouraging use of coastal resources and recognizing that it is in the public interest of the people of Louisiana to establish a responsible balance between development and conservation. Management of renewable coastal resources must proceed in a manner that is consistent with and complementary to the efforts to establish a proper balance between development and conservation.

La. R.S. 49:214.1(C).

22.

This statutory scheme makes clear that, while the parishes have certain missions, powers, and duties pursuant to SLCRMA, the state, through the designated executive branch agencies and offices, is also charged with conserving and restoring Louisiana's coast and developing and implementing policies, plans, and programs to achieve comprehensive integrated coastal protection *statewide*. Thus, state and local governmental entities are charged with acting in coordination and cooperation with each other in performing coastal restoration and hurricane protection. And while the state is tasked with the authority to "articulate a clear statement of priorities and to focus development and implementation of efforts to achieve comprehensive integrated coastal protection," La. R.S. 49:214.1(B), the independent authority of local governmental entities, including parishes, flood protection authorities, political subdivisions, and levee districts has also been maintained.

23.

Considering the constitutional and statutory structure set forth in Louisiana law, the executive branch agencies and offices responsible for the enforcement of the coastal zone management program and coastal protection and restoration have a real interest in ensuring the continued coordination of integrated coastal protection activities. The Louisiana Department of Natural Resources, Office of Coastal Management files this intervention in order to assert and protect those interests.

24.

The defendants are required to comply with all applicable state laws and regulations, including but not limited to SLCRMA. The defendants are also charged with complying with all terms and conditions of their coastal use permits issued pursuant to SLCRMA. To the extent there was a failure by the defendants to obtain permits required by law or to comply with the terms and conditions of their

coastal use permits, there has been a violation of SLCRMA, subjecting the defendants to enforcement pursuant to La. R.S. 49:214.36.

25.

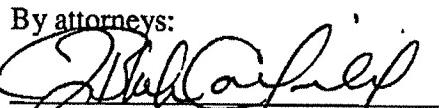
Louisiana Revised Statute 49:214.36 authorizes the assessment of damages, the payment of restoration costs, and actual restoration upon a determination of liability under SLCRMA, and La. R.S. 49:214.36(O) requires that recoverable damages be spent on integrated coastal protection.

PRAYER FOR RELIEF

WHEREFORE, the State of Louisiana through the Louisiana Department of Natural Resources, Office of Coastal Management and the Secretary of DNR, Thomas F. Harris, moves to intervene in this matter and pray that it be permitted to proceed as a party to this action, that after all parties have been duly cited to appear and answer and have been served with a copy of this Intervention, there be judgment in favor of Intervenor:

- (1) That any party or parties found to be liable for violations of SLCRMA be assessed damages, the payment of restoration costs, and actual restoration of the coastal area, in addition to any other appropriate relief authorized by the State Local Coastal Resources Management Act, La. R.S. 49:214.21, *et seq.*, in accordance with La. R.S. 49:214.36 and specifically section 214.36(O);
- (2) Ordering that any judgment requiring actual restoration of lands within the coastal area be consistent with La. R.S. 49:214.21, *et seq.*, and specifically La. R.S. 49:214.36(O), as well as the Hurricane Protection, Flood Control and Coastal Restoration Act, which requires that restoration be used for, and be consistent with, comprehensive integrated coastal protection, including hurricane protection, coastal conservation, or coastal restoration; and
- (3) Ordering the payment of costs, reasonable attorneys' fees, and for full, general, and equitable relief pursuant to Louisiana law.

By attorneys:


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Executive Counsel
Department of Natural Resources
Post Office Box 94396
Baton Rouge, Louisiana 70804
(225) 342-2710 / (225) 342-5861 (fax) blake.canfield@la.gov


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Governor's Office for Coastal Activities
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LEAH COTTEN

April 20, 2016

AUBERT D. TALBOT
(1925-2005)

TO: Cameron Parish Clerk of Court
Attn: Debbie
337-775-7172

FROM: John H. Carmouche

NUMBER OF PAGES: 6
(INCLUDING COVER SHEET)

RE:
Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

DOCUMENTS	NUMBER OF PAGES
Cover letter for service for Original Petition for Damages	5

Please file the attached into the record today and confirm that you received this fax transmission. The original will be forwarded to your office within five days along with a check for your services. If you should have any questions, please call.

If you have any problems with this fax transmission, please call 225-400-9991.

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TALBOT, CARMOUCHE & MARCELLO

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April 22, 2016

WILLIAM R. COENEN, III
BRIAN T. CARMOUCHE
TODD J. WIMBERLEY
ROSS J. DONNES
D. ADELE OWEN
LEAH C. POOLE

AUBERT D. TALBOT
(1925-2005)

VIA HAND DELIVERY

Honorable Cynthia P. King
Cameron Parish Clerk of Court
122 Recreation Lane
Post Office Box 459
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

Dear Ms. King:

Please effect service of the Original Petition for Damages with regard to the referenced manner as follows:

1. **AUSTER OIL AND GAS, INC.**

Through its registered agent for service of process:
John A. Hogan
2036 Olene Drive
Sulphur, LA 70663

2. **APACHE OIL CORPORATION**

✓ Through its registered agent for service of process:
C T Corporation System
350 N. Paul Street, Suite 2900
Dallas, TX 75201

3. **BP AMERICA PRODUCTION COMPANY**

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

4. **CHEVRON PIPE LINE COMPANY**

Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerlous Street
Baton Rouge, LA 70802

2016 APR 21 AM 10 26

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CLERK OF COURT
CAMERON PARISH, LA.

Cynthia P. King

Page 2

5. CHEVRON U.S.A. HOLDINGS, INC.

Through its registered agent for service of process:

Angie Wang c/o ChevronTexaco

✓ P.O. Box 6028
San Ramon, CA 94583

6. CHEVRON U.S.A. INC.

Through its registered agent for service of process:

The Prentice-Hall Corporation System, Inc.

320 Somerulos Street
Baton Rouge, LA 70802

7. DARSEY OPERATING CORPORATION

Through its registered agent for service of process:

William G. Darsey, III
120 Rue Beauregard, Suite 100
Lafayette, LA 70505

8. ENERVEST OPERATING, L.L.C.

Through its registered agents for service of process:

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5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

9. EXXON MOBIL CORPORATION

Through its registered agent for service of process:

Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802

10. FREEPORT SULPHUR COMPANY

Through its registered agent for service of process:

Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802

11. GULFPORT ENERGY CORPORATION

Through its registered agent for service of process:

✓ David L. Patron
Phelps Dunbar LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534

Cynthia P. King
Page 4

19. STAR ENERGY, INC.

Through its registered agent for service of process:
W. Miguel Swanwick
121 River Drive
Lafayette, LA 70503

20. SWEPI LP

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

21. TAYLOR ENERGY COMPANY LLC

Through its registered agent for service of process:
 Paul J. Goodwine
Looper Goodwine & Ballew
601 Poydras Street, Suite 2200
New Orleans, LA 70130

22. TEXAS PACIFIC OIL COMPANY, INC.

Through its registered agent for service of process:
 C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

23. TEXAS PETROLEUM INVESTMENT COMPANY

Through its registered agent for service of process:
 Patrick S. Ottinger
1313 W. Pinhook Road
Lafayette, LA 70503

24. THE TEXAS COMPANY

Through its registered agent for service of process:
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320 Somerulos Street
Baton Rouge, LA 70802

25. TRANSCONTINENTAL OIL CORPORATION

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

Cynthia P. King
Page 5

26. VERNON E. FAULCONER

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

Also enclosed is a check which represents the filing and service fees.

With kindest regards, I am

Very truly yours,

John H. Carmouche

JHC/sls
Enclosures
cc: via e-mail only
Chad Mudd
Keith Prudhomme
David P. Bruchhaus
Matthew P. Keating

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AUBERT D. TALBOT
(1925-2005)

April 22, 2016

VIA HAND DELIVERY

Honorable Cynthia P. King
Cameron Parish Clerk of Court
122 Recreation Lane
Post Office Box 459
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
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Cynthia P. King
Page 3

12. HILCORP ENERGY COMPANY

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13. HONEYWELL INTERNATIONAL INC.

Through its registered agent for service of process:
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320 Somerulos Street
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14. KERR-MCGEE OIL AND GAS ONSHORE LP

Through its registered agent for service of process:
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15. RESOURCE SECURITIES CORPORATION

Through its registered agent for service of process:
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16. SAMUEL GARY JR. & ASSOCIATES, INC.

Through its registered agent for service of process:
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17. SHELL OFFSHORE INC.

Through its registered agent for service of process:
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5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

18. SHELL OIL COMPANY

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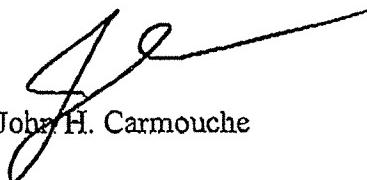
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Baton Rouge, LA 70808

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With kindest regards, I am

Very truly yours,



John H. Carmouche

JHC/sls
Enclosures
cc: via e-mail only
Chad Mudd
Keith Prudhomme
David P. Bruchhaus
Matthew P. Keating

Office of the Governor
State of Louisiana

JOHN BEL EDWARDS
GOVERNOR



P.O. Box 94004
BATON ROUGE, LOUISIANA 70804-9004
(225) 342-7015
GOV.LA.GOV

April 7, 2016

Honorable Cynthia P. King
Clerk of Court - Cameron Parish
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron v. Auster Oil and Gas, Inc., et al.
Number: 10-19582, 38th JDC, Cameron
Our File Number 00060

Dear Ms. King:

Enclosed are an original and one copy of a Petition in Intervention to be filed on behalf of State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris in the above matter.

Please file the original, date-stamp the copy and return it to me in the enclosed self-addressed, stamped envelope. It is my understanding that there are no filing fees due at this time since the filer is a State entity. Please hold service at this time.

If you have any questions, please give me a call (225) 342-8212 or email (sherry.lassere@la.gov). With kindest regards, I remain

Very truly yours,


Sherry G. Lassere, CP
Assistant to Executive Counsel
to the Governor, Matthew F. Block

enclosures

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Kelly B. Becker

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VIA FAX and U.S. Mail

Cynthia P. King
Clerk of Court
38th Judicial District Court
Parish of Cameron
119 Smith Circle
Room 21
Cameron, Louisiana 70631-0549

Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*
38th Judicial District Court, Parish of Cameron
Docket No. 10-19582

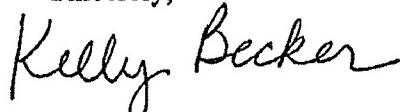
Dear Ms. King:

Enclosed please find a Notice to State Court of Removal filed in the above-captioned matter.

Pursuant to La. R.S. 13:850, we are filing the enclosed by facsimile transmission. Also required by La. R.S. 13:850, we are delivering to you, by U.S. Mail, the original and one copy of the enclosed pleading. We understand that your office will fax to us an invoice for filing costs due. Upon receipt of your invoice, we will forward our firm check to you with the pleading. Please file the pleading in the record and return a date-stamped copy in the enclosed self addressed, stamped envelope to my attention.

Thank you for your assistance and courtesies. If you have any questions, please give me a call.

Sincerely,



Kelly B. Becker

KBB/kge
Enclosure

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CLERK OF COURT

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

CIVIL NO. 10-19582

DIVISION "A"

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

FAX FILED:

FILED: _____

April 22, 2016
DEPUTY CLERK R. Willis
Deputy Clerk of Court

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on April 21, 2016, Defendants, Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants") filed in the office of the Clerk of the United States District Court for the Western District of Louisiana, a Notice of Removal of the above action to said United States District Court.

A copy of such Notice of Removal is annexed hereto.

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for BP America Production Company

/s/ Claire Elizabeth Juneau

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-and-

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, fax, and/or depositing same in the United States mail, postage prepaid and properly addressed, this 21st day of April, 2016.

/s/ Kelly B. Becker

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
(LAKE CHARLES DIVISION)

THE PARISH OF CAMERON,
Plaintiff

v.

AUSTER OIL AND GAS, INC., APACHE OIL
CORPORATION, BP AMERICA PRODUCTION
COMPANY, CHEVRON PIPE LINE COMPANY,
CHEVRON U.S.A. HOLDINGS, INC., CHEVRON
U.S.A., INC., DARSEY OPERATING
CORPORATION, ENERVEST OPERATING, L.L.C.,
EXXON MOBIL CORPORATION, FREEPORT
SULPHUR COMPANY, GULFPORT ENERGY
CORPORATION, HILCORP ENERGY COMPANY,
HONEYWELL INTERNATIONAL, INC., KERR-
MCGEE OIL AND GAS ONSHORE LP, RESOURCE
SECURITIES CORPORATION, SAMUEL GARY JR.
& ASSOCIATES, INC., SHELL OFFSHORE, INC.,
SHELL OIL COMPANY, STAR ENERGY, INC.,
SWEPI LP, TAYLOR ENERGY COMPANY, LLC,
TEXAS PACIFIC OIL COMPANY, INC., TEXAS
PETROLEUM INVESTMENT COMPANY,
THE TEXAS COMPANY, TRANSCONTINENTAL
OIL CORPORATION AND VERNON E.
FAULCONER, INC.

Defendants.

* Civil Action No. _____

* Section: _____

* Judge: Hon. _____

* Mag. Judge: Hon. _____

DEFENDANTS' NOTICE OF REMOVAL

On February 4, 2016, the Parish of Cameron filed its Original Petition for Damages in the 38th Judicial District Court for the Parish of Cameron (the “Petition”) against Defendants Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation (“Defendants”). Without waiving any of their jurisdictional and other defenses, Defendants respectfully remove this civil action from the 38th Judicial District Court if the Parish of Cameron to the United States District Court for the Western District of Louisiana.

INTRODUCTION

Counsel for the Parish has now filed 39 near-identical lawsuits in 3 coastal parishes. Private landowners have filed 4 follow-on petitions. The Attorney General of Louisiana and the Secretary of the Louisiana Department of Natural Resources have since intervened in all of the parish cases. These lawsuits ask state trial judges to preside over what the Parish views as a referendum on a century of prosperous oil and gas activities in Louisiana’s coastal zone.¹ Neither the parishes nor the state entities see any role for the federal government in this process.

But the Parish cannot avoid the fact that Defendants’ oil and gas activities are a critical component of the nation’s energy security and intersect with federal issues across multiple dimensions. For example, the challenged activities include the dredging and maintenance of navigable waterways and transportation of minerals to and from the outer continental shelf. It is beyond dispute that, if successful, the Louisiana coastal cases could have a seismic effect on

¹ See, e.g., *Board of Comm’rs of the Se. La. Flood Protection Auth. v. Tennessee Gas Pipeline Co., LLC*, 2:13-cv-05410, at *80–81 (E.D. La. June 27, 2014) (order denying remand) (“While Plaintiff may not be expressly challenging a specific action of a federal agency, the breadth of Plaintiff’s claims amounts to a collateral attack on an entire regulatory scheme.... Plaintiff’s claims are premised on the notion that this regulatory framework provides inadequate protection for the residents of southeastern Louisiana, and through this litigation, Plaintiff seeks to have the entire oil and gas industry compensate residents for the shortfall.”).

federal energy policy and regulation of Louisiana's coastal zone. This Court has removal jurisdiction under general maritime law and the Outer Continental Shelf Lands Act ("OCSLA").

It bears noting, however, that the federal jurisdictional questions in this case are shrouded in uncertainty. Previously, the Eastern District of Louisiana remanded the 28 cases that the Parishes' counsel brought in Jefferson and Plaquemines Parishes. Key jurisdictional questions at issue in those cases — including the removability of general maritime and OCS pipeline claims — remain "hotly contested." *See, e.g., Riverside Const. Co. v. Entergy Miss., Inc.*, 626 Fed. App'x 443, 445 (5th Cir. 2015), *as revised* (Oct. 16, 2015). Until the Fifth Circuit clarifies the jurisdictional impact of general maritime claims and OCSLA, uncertainty will cause further protracted battles over removal and remand. This Court should consider ending the uncertainty by asserting jurisdiction and certifying an appeal to the Fifth Circuit under 28 U.S.C. § 1292(b).

REMOVAL PREREQUISITES

Under 28 U.S.C. § 1441(a), "any civil action brought in a State court of which the district courts have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action is pending." Because this case satisfies all prerequisites of removal, it belongs in federal court.

Venue. This notice of removal is properly directed to this Court pursuant to § 1441 because this Court is "the district court of the United States for the district and division" within which the State Court Petition is pending. *See* 28 U.S.C. § 98(a).

State Court Record. Pursuant to 28 U.S.C. § 1446(a), Defendants attach as Exhibit 1 a copy of all process, pleadings, and orders in this action and available in the state court record.

Notice of Removal is Timely. Defendants have not yet been served with the Parish of Cameron's Original Petition for damages. Accordingly, this Notice of Removal is timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

Consent. Consents are unnecessary because no Defendants have been served. 28 U.S.C. § 1446(b)(2).

Service. Undersigned counsel certifies that, promptly after the filing of this Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, to effect the removal of the state court action. 28 U.S.C. § 1446(d).

Grounds for Removal. This case is removable because (1) the Parish's claims are subject to maritime jurisdiction and (2) the Parish's claims are subject to OCSLA jurisdiction.

GROUNDS FOR REMOVAL

I. The Parish's claims are subject to maritime jurisdiction.

"A federal court's authority to hear cases in admiralty flows initially from the Constitution, which 'extend[s]' federal judicial power 'to all Cases of admiralty and maritime Jurisdiction.'" U.S. Const., Art. III, § 2; *see also Jerome B. Grubart, Inc. v. Great Lakes Dredge & Dock Co.*, 513 U.S. 527, 531 (1995). "Congress has embodied that power in a statute giving federal district courts 'original jurisdiction [over] . . . [a]ny civil case of admiralty or maritime jurisdiction . . .'" 28 U.S.C. § 1333(1).

Here, many of the injuries alleged by the Parish have allegedly occurred and continue to occur on navigable waters. For example, the Parish asserts that Defendants' allegedly unlawful conduct stems in large part from "the dredging of numerous canals in, through, and across the Operational Area." Pet. ¶ 25. Because these canals are part of a network of navigable waterways

through the lands at issue, this case implicates traditional maritime activities and belongs in federal court. Moreover, whereas in prior coastal lawsuits Jefferson and Plaquemines Parishes expressly disclaimed maritime claims, Cameron Parish's Petition includes no such disclaimer.

See id. ¶ 33.

Defendants recognize that the legal basis of this removal ground is unsettled: there is a well-defined split in authority regarding whether Congress's recent amendments to 28 U.S.C. § 1441 allow general maritime cases to be removed to federal court. Some courts have found that § 1441 does not allow general maritime cases to be removed. *See, e.g., Parish of Plaquemines v. Total Petrochemical & Refining USA, Inc.*, 64 F. Supp. 3d 872, 898–900 (E.D. La. 2014); *Plaquemines Parish v. Rozel Operating Co.*, 2015 WL 403791, at *4 (E.D. La. 2015). Other courts in this Circuit, however, have taken the opposite view that Congress's recent amendments to 28 U.S.C. § 1441 do allow general maritime cases to be removed to federal court. *See, e.g. Carrigan v. M/V AMC Ambassador*, 2014 WL 358353 (S.D. Tex. Jan. 31, 2014); *Bridges v. Phillips 66 Co.*, 2013 WL 6092803 (M.D. La. Nov. 19, 2013) (adopting report and recommendations). Likewise, the only federal appellate court to address the issue held that § 1441 allows general maritime cases to be removed. *Lu Junhong v. Boeing Co.*, 792 F.3d 805 (7th Cir. 2015).² And notably, the removability of general maritime claims currently is before the Fifth Circuit in *Board of Commissioners of the Southeast Louisiana Flood Protection Authority—East, et al v. Tennessee Gas Pipeline Company, LLC, et al*, No. 15-30162 (5th Cir.). This split in authority reflects disagreement among respected jurists on an important question of federal law. Therefore, removal is appropriate and, ultimately, appellate guidance is necessary.

See Riverside Const., 626 Fed. App'x at 445 (removal of maritime claims is "objectively

² Although *Lu Junhong* did not address the effect of the "saving-to-suitors" clause of 28 U.S.C. § 1333, the Fifth Circuit has found that that the "saving-to-suitors" clause does not guarantee a state-court forum. *See Tenn. Gas Pipeline v Hous. Cas. Ins. Co.*, 87 F.3d 150, 153 (5th Cir. 1996).

reasonable” because removability of maritime claims is a “hotly contested and unresolved” issue).

II. The Parish’s claims are subject to federal OCSLA jurisdiction.

Removal is proper under 43 U.S.C. § 1349(b)(1) and 28 U.S.C. § 1441(a) because this action arises “in connection with” oil and gas operations conducted on the outer continental shelf. OCSLA provides that “the subsoil and seabed of the outer Continental Shelf appertain to the United States and are subject to its jurisdiction, control, and power of disposition.” 43 U.S.C. § 1332(1). In turn, OCSLA provides for exclusive federal question jurisdiction over the outer continental shelf by extending “[t]he Constitution and laws and civil and political jurisdiction of the United States . . . [to the Outer Continental Shelf] and all installations and other devices permanently or temporarily attached to the seabed . . . for the purpose of exploring for, developing, or producing resources therefrom.” 43 U.S.C. § 1333(a)(1). A plaintiff need not expressly invoke OCSLA for it to provide a basis for federal jurisdiction. *Amoco Prod. Co. v. Sea Robin Pipeline Co.*, 844 F.2d 1202, 1205 (5th Cir. 1988).

Here, the Parish’s Petition alleges broadly that Defendants operated “drilling and production sites” — including “numerous oil and gas wells,” canals, and pipelines — in violation of Louisiana’s coastal zone management laws. *See, e.g.*, Pet. ¶¶ 17, 19–25. The challenged activities involve components of the dense, highly integrated, and interconnected infrastructure relating to the outer continental shelf. The Parish’s allegations and the relief sought thus “aris[e] out of” and “in connection with” operations conducted on the outer continental shelf, and as such, 43 U.S.C. § 1349(b)(1) grants original jurisdiction in federal court over this action. *See In re Deepwater Horizon*, 745 F.3d 157, 163 (5th Cir. 2014) (citing *EP Operating Ltd. P’ship v.*

Placid Oil Co., 26 F.3d 563, 568-69 (5th Cir. 1994)); *Barker v. Hercules Offshore Inc.*, 713 F.3d 208 (5th Cir. 2013).

Defendants recognize that courts in the Eastern District of Louisiana have previously rejected an argument similar to this one. *See, e.g., Total Petrochemical*, 64 F. Supp. 3d 872 at 893–98. But given the potentially severe effect of this litigation on Defendants' outer continental shelf operations, the important question of whether federal jurisdiction attaches to claims involving pipelines that transport minerals from the outer continental shelf, and the fact-intensive nature of the inquiry, Defendants respectfully submit that removal is proper under OCSLA in this case.

CONCLUSION

Defendants respectfully remove to this Court case number 10-19582 from the 38th District Court of Cameron Parish, Louisiana.

Dated: April 21, 2016

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2016, a copy of the above and foregoing Notice of Removal was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by electronic mail and/or regular mail.

/s/ Kelly B. Becker

CYNTHIA P. KING
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court

Vs No: 10-19582 : Parish of Cameron

Austin Oil & Gas Inc. et al : State of Louisiana

Dear Council,

I hereby acknowledge receipt of your notice of filing notice of Removal ; notice of Removal

for filing on this 22nd day of April. 2016. Within 7

days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$ 151.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

This does not include charge for Exhibits that were not faxed.
Charge for Exhibits are \$2.00 per page.

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Fax Transmittal

To:	HON. CYNTHIA P. KING, Clerk	Total No. of Pages:	17
Company:	38th JDC, Cameron Parish	Date/Time Sent:	April 21, 2016
Fax No.:	337-775-7172	Client/Matter No.:	99900.0007
Contact No.:	337-775-5136		
From:	Kelly B. Becker, Esq.		
Direct No.:	504-556-4067		
E-mail:	rbmcneal@liskow.com		

Comments: **PLEASE SEE THE ATTACHED.**

The information contained in this facsimile message is legally privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the U.S. Postal Service.

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VIA FAX and U.S. Mail

Cynthia P. King
Clerk of Court
38th Judicial District Court
Parish of Cameron
119 Smith Circle
Room 21
Cameron, Louisiana 70631-0549

Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*
38th Judicial District Court, Parish of Cameron
Docket No. 10-19582

Dear Ms. King:

Enclosed please find a Notice to State Court of Removal filed in the above-captioned matter.

Pursuant to La. R.S. 13:850, we are filing the enclosed by facsimile transmission. Also required by La. R.S. 13:850, we are delivering to you, by U.S. Mail, the original and one copy of the enclosed pleading. We understand that your office will fax to us an invoice for filing costs due. Upon receipt of your invoice, we will forward our firm check to you with the pleading. Please file the pleading in the record and return a date-stamped copy in the enclosed self addressed, stamped envelope to my attention.

Thank you for your assistance and courtesies. If you have any questions, please give me a call.

Sincerely,



Kelly B. Becker

KBB/kge
Enclosure

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RECEIVED & FILED

2016 APR 22 AM 8 33

CLERK OF COURT
38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON
CAMERON PARISH, LA.

STATE OF LOUISIANA

CIVIL NO. 10-19582

DIVISION "A"

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

FILED: _____

DEPUTY CLERK

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on April 21, 2016, Defendants, Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants") filed in the office of the Clerk of the United States District Court for the Western District of Louisiana, a Notice of Removal of the above action to said United States District Court.

A copy of such Notice of Removal is annexed hereto.

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, fax, and/or depositing same in the United States mail, postage prepaid and properly addressed, this 21st day of April, 2016.

/s/ Kelly B. Becker

Case 2: cv-00530 Document 1 Filed 04/21/16 Page 1 of 11 PageID #: 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
(LAKE CHARLES DIVISION)

THE PARISH OF CAMERON,
Plaintiff

v.

AUSTER OIL AND GAS, INC., APACHE OIL
CORPORATION, BP AMERICA PRODUCTION
COMPANY, CHEVRON PIPE LINE COMPANY,
CHEVRON U.S.A. HOLDINGS, INC., CHEVRON
U.S.A., INC., DARSEY OPERATING
CORPORATION, ENERVEST OPERATING, L.L.C.,
EXXON MOBIL CORPORATION, FREEPORT
SULPHUR COMPANY, GULFPORT ENERGY
CORPORATION, HILCORP ENERGY COMPANY,
HONEYWELL INTERNATIONAL, INC., KERR-
MCGEE OIL AND GAS ONSHORE LP, RESOURCE
SECURITIES CORPORATION, SAMUEL GARY JR.
& ASSOCIATES, INC., SHELL OFFSHORE, INC.,
SHELL OIL COMPANY, STAR ENERGY, INC.,
SWEPI LP, TAYLOR ENERGY COMPANY, LLC,
TEXAS PACIFIC OIL COMPANY, INC., TEXAS
PETROLEUM INVESTMENT COMPANY,
THE TEXAS COMPANY, TRANSCONTINENTAL
OIL CORPORATION AND VERNON E.
FAULCONER, INC.

Defendants.

Civil Action No. _____

Section: _____

Judge: Hon. _____

Mag. Judge: Hon. _____

RECEIVED & FILED

2016 APR 22 AM 8 33

CLERK OF COURT
CAMERON PARISH, LA.

DEFENDANTS' NOTICE OF REMOVAL

On February 4, 2016, the Parish of Cameron filed its Original Petition for Damages in the 38th Judicial District Court for the Parish of Cameron (the "Petition") against Defendants Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants"). Without waiving any of their jurisdictional and other defenses, Defendants respectfully remove this civil action from the 38th Judicial District Court if the Parish of Cameron to the United States District Court for the Western District of Louisiana.

INTRODUCTION

Counsel for the Parish has now filed 39 near-identical lawsuits in 3 coastal parishes. Private landowners have filed 4 follow-on petitions. The Attorney General of Louisiana and the Secretary of the Louisiana Department of Natural Resources have since intervened in all of the parish cases. These lawsuits ask state trial judges to preside over what the Parish views as a referendum on a century of prosperous oil and gas activities in Louisiana's coastal zone.¹ Neither the parishes nor the state entities see any role for the federal government in this process.

But the Parish cannot avoid the fact that Defendants' oil and gas activities are a critical component of the nation's energy security and intersect with federal issues across multiple dimensions. For example, the challenged activities include the dredging and maintenance of navigable waterways and transportation of minerals to and from the outer continental shelf. It is beyond dispute that, if successful, the Louisiana coastal cases could have a seismic effect on

¹ See, e.g., *Board of Comm'r's of the Se. La. Flood Protection Auth. v. Tennessee Gas Pipeline Co., LLC*, 2:13-cv-05410, at *80-81 (E.D. La. June 27, 2014) (order denying remand) ("While Plaintiff may not be expressly challenging a specific action of a federal agency, the breadth of Plaintiff's claims amounts to a collateral attack on an entire regulatory scheme.... Plaintiff's claims are premised on the notion that this regulatory framework provides inadequate protection for the residents of southeastern Louisiana, and through this litigation, Plaintiff seeks to have the entire oil and gas industry compensate residents for the shortfall.").

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federal energy policy and regulation of Louisiana's coastal zone. This Court has removal jurisdiction under general maritime law and the Outer Continental Shelf Lands Act ("OCSLA").

It bears noting, however, that the federal jurisdictional questions in this case are shrouded in uncertainty. Previously, the Eastern District of Louisiana remanded the 28 cases that the Parishes' counsel brought in Jefferson and Plaquemines Parishes. Key jurisdictional questions at issue in those cases — including the removability of general maritime and OCS pipeline claims — remain "hotly contested." *See, e.g., Riverside Const. Co. v. Entergy Miss., Inc.*, 626 Fed. App'x 443, 445 (5th Cir. 2015), as revised (Oct. 16, 2015). Until the Fifth Circuit clarifies the jurisdictional impact of general maritime claims and OCSLA, uncertainty will cause further protracted battles over removal and remand. This Court should consider ending the uncertainty by asserting jurisdiction and certifying an appeal to the Fifth Circuit under 28 U.S.C. § 1292(b).

REMOVAL PREREQUISITES

Under 28 U.S.C. § 1441(a), "any civil action brought in a State court of which the district courts have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action is pending." Because this case satisfies all prerequisites of removal, it belongs in federal court.

Venue. This notice of removal is properly directed to this Court pursuant to § 1441 because this Court is "the district court of the United States for the district and division" within which the State Court Petition is pending. *See* 28 U.S.C. § 98(a).

State Court Record. Pursuant to 28 U.S.C. § 1446(a), Defendants attach as Exhibit 1 a copy of all process, pleadings, and orders in this action and available in the state court record.

Notice of Removal is Timely. Defendants have not yet been served with the Parish of Cameron's Original Petition for damages. Accordingly, this Notice of Removal is timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

Consent. Consents are unnecessary because no Defendants have been served. 28 U.S.C. § 1446(b)(2).

Service. Undersigned counsel certifies that, promptly after the filing of this Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, to effect the removal of the state court action. 28 U.S.C. § 1446(d).

Grounds for Removal. This case is removable because (1) the Parish's claims are subject to maritime jurisdiction and (2) the Parish's claims are subject to OCSLA jurisdiction.

GROUND FOR REMOVAL

I. The Parish's claims are subject to maritime jurisdiction.

"A federal court's authority to hear cases in admiralty flows initially from the Constitution, which 'extend[s]' federal judicial power 'to all Cases of admiralty and maritime Jurisdiction.'" U.S. Const., Art. III, § 2; *see also Jerome B. Grubart, Inc. v. Great Lakes Dredge & Dock Co.*, 513 U.S. 527, 531 (1995). "Congress has embodied that power in a statute giving federal district courts 'original jurisdiction [over] . . . [a]ny civil case of admiralty or maritime jurisdiction . . .'" 28 U.S.C. § 1333(1).

Here, many of the injuries alleged by the Parish have allegedly occurred and continue to occur on navigable waters. For example, the Parish asserts that Defendants' allegedly unlawful conduct stems in large part from "the dredging of numerous canals in, through, and across the Operational Area." Pet. ¶ 25. Because these canals are part of a network of navigable waterways

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through the lands at issue, this case implicates traditional maritime activities and belongs in federal court. Moreover, whereas in prior coastal lawsuits Jefferson and Plaquemines Parishes expressly disclaimed maritime claims, Cameron Parish's Petition includes no such disclaimer. See *id.* ¶ 33.

Defendants recognize that the legal basis of this removal ground is unsettled: there is a well-defined split in authority regarding whether Congress's recent amendments to 28 U.S.C. § 1441 allow general maritime cases to be removed to federal court. Some courts have found that § 1441 does not allow general maritime cases to be removed. See, e.g., *Parish of Plaquemines v. Total Petrochemical & Refining USA, Inc.*, 64 F. Supp. 3d 872, 898–900 (E.D. La. 2014); *Plaquemines Parish v. Rozel Operating Co.*, 2015 WL 403791, at *4 (E.D. La. 2015). Other courts in this Circuit, however, have taken the opposite view that Congress's recent amendments to 28 U.S.C. § 1441 do allow general maritime cases to be removed to federal court. See, e.g. *Carrigan v. M/V AMC Ambassador*, 2014 WL 358353 (S.D. Tex. Jan. 31, 2014); *Bridges v. Phillips 66 Co.*, 2013 WL 6092803 (M.D. La. Nov. 19, 2013) (adopting report and recommendations). Likewise, the only federal appellate court to address the issue held that § 1441 allows general maritime cases to be removed. *Lu Junhong v. Boeing Co.*, 792 F.3d 805 (7th Cir. 2015).² And notably, the removability of general maritime claims currently is before the Fifth Circuit in *Board of Commissioners of the Southeast Louisiana Flood Protection Authority—East, et al v. Tennessee Gas Pipeline Company, LLC, et al*, No. 15-30162 (5th Cir.). This split in authority reflects disagreement among respected jurists on an important question of federal law. Therefore, removal is appropriate and, ultimately, appellate guidance is necessary. See *Riverside Const.*, 626 Fed. App'x at 445 (removal of maritime claims is "objectively

² Although *Lu Junhong* did not address the effect of the "saving-to-suitors" clause of 28 U.S.C. § 1333, the Fifth Circuit has found that that the "saving-to-suitors" clause does not guarantee a state-court forum. See *Tenn. Gas Pipeline v Hous. Cas. Ins. Co.*, 87 F.3d 150, 153 (5th Cir. 1996).

reasonable" because removability of maritime claims is a "hotly contested and unresolved" issue).

II. The Parish's claims are subject to federal OCSLA jurisdiction.

Removal is proper under 43 U.S.C. § 1349(b)(1) and 28 U.S.C. § 1441(a) because this action arises "in connection with" oil and gas operations conducted on the outer continental shelf. OCSLA provides that "the subsoil and seabed of the outer Continental Shelf appertain to the United States and are subject to its jurisdiction, control, and power of disposition." 43 U.S.C. § 1332(1). In turn, OCSLA provides for exclusive federal question jurisdiction over the outer continental shelf by extending "[t]he Constitution and laws and civil and political jurisdiction of the United States . . . [to the Outer Continental Shelf] and all installations and other devices permanently or temporarily attached to the seabed . . . for the purpose of exploring for, developing, or producing resources therefrom." 43 U.S.C. § 1333(a)(1). A plaintiff need not expressly invoke OCSLA for it to provide a basis for federal jurisdiction. *Amoco Prod. Co. v. Sea Robin Pipeline Co.*, 844 F.2d 1202, 1205 (5th Cir. 1988).

Here, the Parish's Petition alleges broadly that Defendants operated "drilling and production sites" — including "numerous oil and gas wells," canals, and pipelines — in violation of Louisiana's coastal zone management laws. *See, e.g.*, Pet. ¶¶ 17, 19–25. The challenged activities involve components of the dense, highly integrated, and interconnected infrastructure relating to the outer continental shelf. The Parish's allegations and the relief sought thus "aris[e] out of" and "in connection with" operations conducted on the outer continental shelf, and as such, 43 U.S.C. § 1349(b)(1) grants original jurisdiction in federal court over this action. *See In re Deepwater Horizon*, 745 F.3d 157, 163 (5th Cir. 2014) (citing *EP Operating Ltd. P'ship v.*

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Placid Oil Co., 26 F.3d 563, 568-69 (5th Cir. 1994)); *Barker v. Hercules Offshore Inc.*, 713 F.3d 208 (5th Cir. 2013).

Defendants recognize that courts in the Eastern District of Louisiana have previously rejected an argument similar to this one. *See, e.g., Total Petrochemical*, 64 F. Supp. 3d 872 at 893–98. But given the potentially severe effect of this litigation on Defendants' outer continental shelf operations, the important question of whether federal jurisdiction attaches to claims involving pipelines that transport minerals from the outer continental shelf, and the fact-intensive nature of the inquiry, Defendants respectfully submit that removal is proper under OCSLA in this case.

CONCLUSION

Defendants respectfully remove to this Court case number 10-19582 from the 38th District Court of Cameron Parish, Louisiana.

Dated: April 21, 2016

Respectfully submitted,

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Case 2:16-cv-00530 Document 1 Filed 04/21/16 Page 10 of 11 PageID #: 10

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Case 2:16-cv-00530 Document 1 Filed 04/21/16 Page 11 of 11 PageID #: 11

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2016, a copy of the above and foregoing Notice of Removal was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by electronic mail and/or regular mail.

/s/ Kelly B. Becker

TIME : 04-22-2016 08:39
FAX NO.1 : 337-775-7172
NAME : Cameron Clerk Court

FILE NO. : 287
DATE : 04.22 08:36
TO : 15045564108-3400
DOCUMENT PAGES : 3
START TIME : 04.22 08:37
END TIME : 04.22 08:39
PAGES SENT : 3
STATUS : OK

SUCCESSFUL TX NOTICE

CYNTHIA P. KING
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38th Judicial District Court
Vs No: 10-19582 : Parish of Cameron
Quinton Dier v: Gasoline et al : State of Louisiana

Dear Council

I hereby acknowledge receipt of your notice of filing notice of removal; notice of Removal for filing on this 2nd day of April, 2016. Within 7 days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$ 151.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

This does not include charge for exhibits that were not found.
Charges for Exhibits are \$2.00 per page
504-556-4108



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15894300

June 8, 2016

Clerk, 38th JDC, Cameron Parish
P.O. Box 549
Cameron, LA 70631

Re: The Parish of Cameron v.
Auster Oil and Gas, Inc., et al
Docket No.: 10-19582

Dear Clerk:

Enclosed are the original and one copy of Apache Corporation's Supplemental Notice of Removal, filed this date in the United States District Court for the Western District of Louisiana. Please file the original into the record and return a file-stamped copy to me in the enclosed self-addressed stamped envelope. My firm's check in the amount of \$33.00 is enclosed to cover the costs of filing.

Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Carmen M. Rodriguez".

CMR:kg
Enclosures

{L0394553.1}

JONES WALKER LLP.

ALABAMA • ARIZONA • CALIFORNIA • DISTRICT OF COLUMBIA • FLORIDA • GEORGIA • LOUISIANA • MISSISSIPPI • NEW YORK • OHIO • TEXAS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

THE PARISH OF CAMERON, ET AL

CIVIL ACTION NO. 16-559

VERSUS

JUDGE MINALDI

AUSTER OIL AND GAS, INC., ET AL

MAGISTRATE JUDGE KAY A.

CLERK OF COURT
CAMERON PARISH, LA.

RECEIVED & FILED

2016 JUN 13 AM 11:20

SUPPLEMENTAL NOTICE OF REMOVAL

Defendant Apache Corporation (“Apache”), erroneously named in the Petition as Apache Oil Corporation, and with a full reservation of rights, supplements as follows the bases for removal regarding the civil action filed in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, entitled *The Parish of Cameron v. Auster Oil and Gas, Inc., et al*, Docket No. 10-19582. A copy of the Petition previously has been filed into the record of this matter as an attachment to the Notice of Removal filed by Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings, Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation. See Rec. Doc. 1-2.

1. ***Venue.*** This Court is a proper venue because the Parish of Cameron filed the Petition on February 4, 2016 in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, Civil Action No. 10-19582. The 38th Judicial District Court is located within the geographic confines of the Lake Charles Division of the Western District of Louisiana.

2. ***State Court Record.*** Pursuant to 28 U.S.C. § 1446(a), Apache incorporates by reference the documents filed at Rec. Doc. 1-2, which is an attachment to the original Notice of

Removal. Rec. Doc. 1-2 consists of a true and correct copy of all process, pleadings, and orders contained in the state court record at the time of the original removal. Rec. Doc. 1-2 is incorporated as an attachment to this Supplemental Notice of Removal. Apache has confirmed, through the Clerk of Court for the 38th Judicial District Court for Cameron Parish, Louisiana, that nothing further has been filed into the state court public record since the filing of the original Notice of Removal.

3. ***Notice of Removal is Timely.*** Apache was served with a copy of the Petition on May 9, 2016. Accordingly, this Supplemental Notice of Removal is being filed within thirty days after the receipt by Apache, through service or otherwise, of a copy of the Petition and is therefore timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

4. ***Consent.*** The record before this Court shows that, at the time this matter was removed, all Defendants that had been named in this action and that the court record showed had been served, consent to the removal.

5. ***Notice of Removal.*** Pursuant to 28 U.S.C. § 1446(d), undersigned counsel certifies that, promptly after the filing of this Supplemental Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, as provided by law, to document an additional jurisdictional basis for the removal of the state court action.

GROUNDS FOR REMOVAL

6. ***Jurisdictional Bases.*** Apache adopts as if fully set forth herein the bases for removal identified in Defendants' Notice of Removal filed April 21, 2016. In addition to the grounds identified in that Notice, this case is independently removable under 28 U.S.C. §

1441(b) because it is “founded on a claim or right arising under the Constitution, treaties or laws of the United States.” *See also* 28 U.S.C. § 1331.

7. ***Applicable Law.*** It is well established that federal question jurisdiction exists where the plaintiff’s claim, though pled under state law, “necessarily raise[s] a stated federal issue, actually disputed and substantial, which a federal forum may entertain without disturbing any congressionally approved balance of federal and state judicial responsibilities.” Grable & Sons Metal Prods. Inc. v. Darue Eng’r & Mfg., 545 U.S. 308, 314 (2005); *see also* Franchise Tax Bd. v. Construction Laborers Vacation Trust, 463 U.S. 1, 13 (1983) (“Even though state law creates appellant’s causes of action, its case might still ‘arise under’ the laws of the United States if a well-pleaded complaint established that its right to relief under state law requires resolution of a substantial question of federal law in dispute between the parties.”). The Fifth Circuit, applying these tenets, has held that where the *remedy* sought by the plaintiff cannot be granted without the application of federal law, the complaint may raise a federal question, despite the plaintiff’s effort to proceed exclusively under state law. *See Medina v. Ramsey Steel Co.*, 238 F.3d 674, 680 (5th Cir. 2001); *see also* Gillis v. Louisiana, 294 F.3d 755, 760 (5th Cir. 2002) (concluding that plaintiff was “implicitly” proceeding under federal law in part based on relief sought).

8. ***Plaintiff’s Allegations.*** Plaintiff’s complaint necessarily raises questions of federal law. Plaintiff alleges that Defendants’ oil and gas activities have resulted in the “dredging of numerous canals in, through, and across the Operational Area.” Complaint, at p. 14, ¶ 25. Defendants allegedly failed to design, construct, and maintain the canals using the best practical techniques. Id. Allegedly as a consequence, Defendants’ dredging activities resulted in the “degradation” of the Operational Area and increased the risk of storm-generated surges and

other flooding damage. *Id.* Plaintiff seeks, among other things, the revegetation, refilling, cleaning, detoxification, and “actual restoration” of the alleged affected areas. Complaint, at p. 14, ¶ 25, Prayer for Relief(c). That remedy necessarily entails reference to and the application and interpretation of federal law, which pervasively regulates coastal restoration through an intricate web of statutes and rules, as the Plaintiff acknowledges. *See Compl.* at pp. 6-11, ¶¶ 4-18. Apache in no way concedes that the Plaintiff is entitled to the remedies it seeks; to the contrary, it will contest vigorously every aspect of the Plaintiff’s claims, including whether the court possesses authority to grant the Parish the relief it seeks, whether the Parish is entitled to such relief, and whether the relief requested is appropriate under the applicable federal legal and regulatory standards.

9. *The Plaintiff’s Demand Necessarily Implicates Federal Law.* The property at issue in this lawsuit is subject to an extensive array of federal laws that implicate complex questions of federal policy in areas as diverse as coastal restoration, environmental protection, energy policy, national security, navigation, and interstate commerce, to name but a few. Indeed, numerous federal statutes and regulations expressly recognize the strong federal policy interests in those areas. For example, the Coastal Zone Management Act recognizes that “[t]here is a national interest in the effective management, beneficial use, protection, and development of the coastal zone.” 16 U.S.C. § 1451(a). And Congress has declared that it is a “*national policy . . .* ‘(a) to preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation’s coastal zone for this and succeeding generations . . .’” *U.S. v. Holland*, 373 F. Supp. 665, 674, n.14 (M.D. Fla. 1974) (emphasis added) (citing 16 U.S.C. § 1452). Reflecting in part this national policy, for example, the Rivers and Harbors Act requires that an applicant obtain the approval of the Army Corps of Engineers before any navigable canal may be dredged, filled, or

altered, and makes it unlawful “to excavate or fill, or in any manner to alter or modify the course, location, condition, or capacity of, any, canal, lake, harbor or refuge . . . or of the channel of any navigable water of the United States, unless the work has been” permitted by the Army Corps. 33 U.S.C. § 403 (emphasis added). Because the plaintiff’s complaint necessarily raises complex and interrelated issues involving many areas addressed by federal statutes and regulations, this case is one in which there is “a serious federal interest in claiming the advantages thought to be inherent in a federal forum.” Grable, 545 U.S. at 313-314.

10. **Federal/State Comity.** Exercising federal jurisdiction in this case does not disturb the congressionally-approved balance of federal and state judicial responsibilities. To the contrary, there is a clear interest in making a federal forum available here. Grable, 545 U.S. at 319. Addressing and resolving the competing interests of navigation, interstate commerce, energy resource development, and coastal zone management is an exercise long conducted at the federal level, and not a field that historically has been regulated primarily by the states. Cf. Gunn v. Minton, 133 S. Ct. 1059, 1066 (2013) (noting that states have a traditional role in regulating lawyers, and thus transferring legal malpractice cases from state to federal court would threaten to upset the federal-state balance). Indeed, the Parish’s complaint is the rare case that, although attempting to plead only state causes of action, raises substantial and serious federal questions in an area of unique federal concern. Recognizing jurisdiction here, therefore, does not noticeably affect the “federal-state division of labor.” Grable, 545 U.S. at 315. In sum, “there is no good reason to shirk from federal jurisdiction over the dispositive and contested federal issue[s] at the heart of” the Parish’s complaint. See Id. at 319-320.

Apache requests that the discontinuance of further proceedings in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, triggered by the original Notice of

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Removal in this matter, be extended by this Supplemental Notice of Removal and that this action be recognized as removed to and pending on the docket of the United States District Court for the Western District of Louisiana on the jurisdictional grounds described in this Supplemental Notice of Removal, as the law in such cases provides.

Respectfully submitted:

JONES WALKER LLP

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ATTORNEYS FOR APACHE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2016, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

/s/ Carmen M. Rodriguez

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May 11, 2018

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CHRSTOPHER D. MARTIN

AUBERT D. TALBOT
(1925-2005)

Honorable Susan Racca
Cameron Parish Clerk of Court
119 Smith Circle Room 21
Post Office Box 549
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

Dear Ms. Racca:

Please effect service of the Original Petition for Damages in the referenced manner as follows:

1. **AUSTER OIL AND GAS, INC.**

Through its registered agent for service of process:
John A. Hogan
2036 Olene Drive
Sulphur, LA 70663

2. **DARSEY OPERATING CORPORATION**

Through its registered agent for service of process:
William G. Darsey, III or Robert K. Irwin
120 Rue Beauregard, Suite 100
Lafayette, LA 70505

3. **RESOURCE SECURITIES CORPORATION**

Through its registered agent for service of process:
Wayne Hyman
124 Oak Coulee Drive
Lafayette, LA 70507

4. **STAR ENERGY, INC.**

Through its registered agent for service of process:
W. Miguel Swanwick
121 River Drive
Lafayette, LA 70503

RECEIVED & FILED
2018 MAY 11 PM 1:19
CLERK OF COURT
CAMERON PARISH, LA

Susan Racca
Page 2
May 11, 2018

Also enclosed is a check which represents the filing and service fees.

With kindest regards, I am

Very truly yours,

John H. Carmouche/SLC

John H. Carmouche

JHC/sls
Enclosures
cc: All counsel of record via e-mail only

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

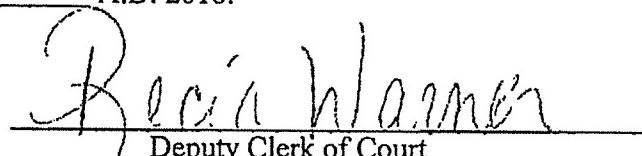
38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: RESOURCE SECURITIES CORPORATION, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: WAYNE HYMAN, 124 OAK COULEE DRIVE,
LAFAYETTE, LA 70507

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.



Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

***** STATE COST EXEMPT

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ _____ SERVED: _____ PERSONAL _____ DOMICILIARY

MILEAGE\$ _____ SERVED TO: _____

TOTAL \$ _____ REMARKS: _____

DATE SERVED: _____ DEPUTY SIGNATURE & BADGE NUMBER

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

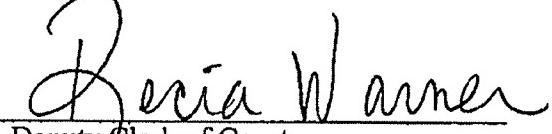
38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: AUSTER OIL & GAS INC, THROUGH ITS REGISTERED AGENT FOR SERVICE OF PROCESS: JOHN A HOGAN, 2036 OLENE DRIVE, SULPHUR, LA 70663

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018


Recia Warner
Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

* * * * * STATE COST EXEMPT

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ _____ SERVED: _____ PERSONAL _____ DOMICILIARY

MILEAGES _____ SERVED TO: _____

TOTAL \$ _____ REMARKS: _____

DATE SERVED: _____ DEPUTY SIGNATURE & BADGE NUMBER

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

**38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA**

TO: STAR ENERGY INC, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: W MIGUEL SWANWICK, 121 RIVER DRIVE,
LAFAYETTE, LA 70503

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of
MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.

REQUESTED BY: JOHN CARMOUCHE P1

Deputy Clerk of Court

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$. **SERVED:** **PERSONAL** **DOMICILIARY**

MILEAGES **SERVED TO:**

TOTAL \$ _____ REMARKS: _____

DATE SERVED: _____

DATE SERVED: _____ **DEPUTY SIGNATURE & BADGE NUMBER**

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

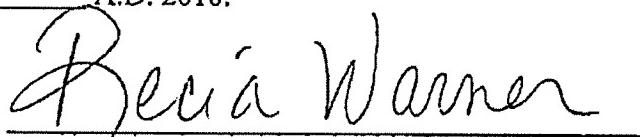
38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: DARSEY OPERATING CORPORATION, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: WILLIAM G DARSEY III OR ROBERT K IRWIN,
120 RUE BEAUREGARD STE 100, LAFAYETTE, LA 70505

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.



Deputy Clerk of Court

REQUESTED BY: JOHN CARMOCHE P1

STATE COST EXEMPT

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ _____ SERVED: _____ PERSONAL _____ DOMICILIARY

_____ MILEAGES _____ SERVED TO: _____

TOTAL \$ _____ REMARKS: _____

DATE SERVED: _____ DEPUTY SIGNATURE & BADGE NUMBER

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582 CLERK OF COURT LA.

THE PARISH OF CAMERON
VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOSIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

FILED: _____

DEPUTY CLERK OF COURT

REQUEST FOR NOTICE OF TRIAL, NOTICE OF
JUDGMENT, AND NOTICE OF REPRESENTATION

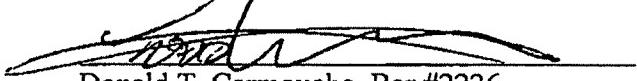
TO: CLERK OF COURT
PARISH OF CAMERON

Please be advised that undersigned counsel will represent plaintiff, The Parish of Cameron, and to hereby request that written notice be mailed to undersigned counsel by the Clerk, by certified mail, properly stamped and addressed, at least ten (10) days before the date fixed for the trial on the merits hereof, or any hearing on any other matter herein, all in accordance with La. C. P. art. 1572.

It is further requested that the undersigned be sent notice of the rendition and signing of all final judgments and interlocutory orders or judgments pursuant to La. C. C. P. articles 1913 and 1914.

By Attorneys:

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Attorneys for Plaintiffs

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON
VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOSIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and forgoing pleading has been forwarded to the following counsel of record by electronic mail and/or by placing same in the United States mail, postage prepaid, and properly addressed.

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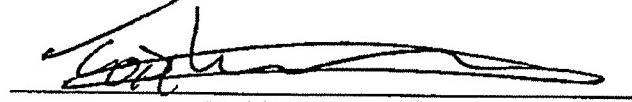
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Onshore, LP*

Baton Rouge, Louisiana this 11th day of May, 2018.



Todd J. Wimberley

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
OFFICE OF THE CLERK

May 9, 2018

Susan Racca, Clerk of Court
38th Judicial District Court
Cameron Parish
P O Box 549
Cameron, LA 70631

RECEIVED & FILED
2018 MAY 14 A 10:22
CLERK OF COURT
CAMERON PARISH, LA.

In re: Civil Action No. 2:16-cv-00530-TAD-KK
CAMERON V. AUSTER OIL & GAS INC ET AL
Your Case No. 10-19582

Dear Clerk:

Please be advised that the above captioned matter has been remanded to your Court. We enclose herewith a certified copy of our docket sheet and the Judgment or Order to Remand.

The official court record for the Western District of Louisiana is the electronic case filing system, CM/ECF. Our website is: <http://ecf.lawd.uscourts.gov>; counsel may access this database to obtain any pleadings you require.

Please acknowledge receipt on the enclosed copy of this letter.

ATTORNEYS ARE ADVISED THAT ALL FUTURE FILINGS SHOULD BE DIRECTED TO THE RECEIVING COURT NAMED ABOVE.

For questions regarding this document or transmission, please call our CM/ECF help desk at 1-866-323-1101.

THUS DONE May 9, 2018.

TONY R. MOORE
CLERK OF COURT

A Crawford
DEPUTY CLERK OF COURT

ATTENTION

**U.S. District Court
Western District of Louisiana (Lake Charles)
CIVIL DOCKET FOR CASE #: 2:16-cv-00530-TAD-KK**

Cameron v. Auster Oil & Gas Inc et al

Assigned to: Judge Terry A Doughty

Referred to: Magistrate Judge Kathleen Kay

Demand: \$0

Related Cases: [2:16-cv-00531-TAD-KK](#)

[2:16-cv-00532-TAD-KK](#)

[2:16-cv-00535-TAD-KK](#)

[2:16-cv-00536-TAD-KK](#)

[2:16-cv-00537-TAD-KK](#)

[2:16-cv-00538-TAD-KK](#)

[2:16-cv-00539-TAD-KK](#)

[2:16-cv-00540-TAD-KK](#)

[2:16-cv-00541-TAD-KK](#)

[2:16-cv-00542-TAD-KK](#)

Case in other court: 38th JDC (Cameron), 10-19582

Cause: 43:1331 General Maritime/OCSLA

Plaintiff

Parish of Cameron

Date Filed: 04/21/2016

Jury Demand: Both

Nature of Suit: 890 Other Statutory

Actions

Jurisdiction: Federal Question

represented by **Donald T Carmouche**

Talbot Carmouche & Marcello (BR)

17405 Perkins Rd

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Fax: 225-644-5226

Email: dcoffice@tcmlawfirm.net

LEAD ATTORNEY

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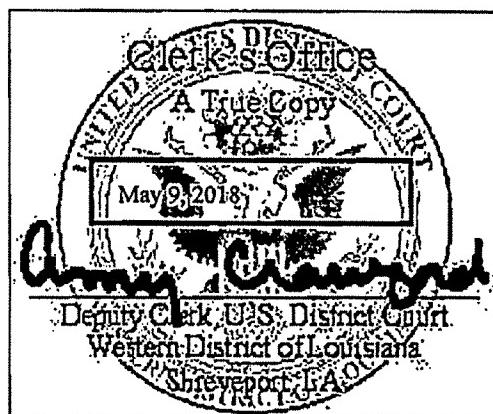
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on behalf of

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on behalf of
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V.

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Defendant

Apache Oil Corp
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Defendant

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Defendant

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Date Filed	#	Docket Text
04/21/2016	<u>1</u>	NOTICE of Removal from 38th JDC Cameron Parish, Case Number 10-19582 with Jury Demand; (Filing fee \$400, receipt number 0536-3052719) filed by Chevron U S A Inc, Shell Offshore Inc, Chevron USA Holdings Inc, The Texas Co, Swepi L P, BP America Production Co, Shell Oil Co, Exxon Mobil Corp, Chevron Pipe Line Co. (Attachments: # <u>1</u> Civil cover sheet, # <u>2</u> Exhibit Ex 1 - State Court Record) (aty,Becker, Kelly) (Attachment 1 replaced on 4/22/2016) (Thigpen, M). (Entered: 04/21/2016), (QC'ed on 04/22/2016, by Thigpen , M)
04/21/2016		INTERVENOR COMPLAINT filed by State of Louisiana. ADMINISTRATIVE ENTRY: (THE PDF IMAGE CAN BE FOUND IN ATTACHMENT #2 OF DOCUMENT <u>1</u> NOTICE OF REMOVAL).(crt,Thigpen, M) (Entered: 04/22/2016), (QC'ed on 04/22/2016, by Thigpen , M)
04/21/2016		CASE Assigned to Judge Patricia Minaldi and Magistrate Judge Kathleen Kay. (crt,Thigpen, M) (Entered: 04/22/2016)
04/21/2016		INTERVENOR COMPLAINT filed in Case #10-19582, 38th JDC, Cameron Parish, on 4/13/2016 by State of Louisiana obo LA Dept of Natural Resources. ADMINISTRATIVE ENTRY as pleading filed within pdf of attachment #2 to <u>1</u> Notice of Removal (crt,Putch, A). Modified on 4/25/2016 to edit filer (Putch, A). (Entered: 04/25/2016), (QC'ed on 04/28/2016, by Thigpen , M)
04/22/2016	<u>2</u>	NOTICE of Corporate Disclosure Statement Requirement re: <u>1</u> Notice of Removal, sent to Joe B Norman, Alexandra Giselle White, Robert B McNeal, Michael P Cash, Jamie D Rhymes, Martin A Stern, Glen M Pilie', Jeffrey E Richardson, David M Stein, Roy C Cheatwood, Monica A Frois, George Arceneaux, III, Matthew A Woolf, Tyler L Weidlich, Kelly Brechtel Becker, Russell Keith Jarrett, Mark L McNamara, Dana M Douglas, Brittan Jackson Bush, Claire Elizabeth Juneau, Charles S McCowan, III, Louis V Gregoire, Jr, Pamela R Mascari, Michael R Phillips, Eric J Mayer on behalf of BP America Production Co, Chevron Pipe Line Co, Chevron U S A Inc, Chevron USA Holdings Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P. Corporate Disclosure Statement due by 5/6/2016. (crt,Thigpen, M) (Entered: 04/22/2016)
04/22/2016	<u>3</u>	PROPOSED ORDER referred to Magistrate Judge Kay. (Public entry, but no electronic notice). (crt,Thigpen, M) (Entered: 04/22/2016)
04/25/2016	<u>4</u>	REMOVAL ORDER forwarded to all counsel of record. Signed by Magistrate Judge Kathleen Kay on 04/25/2016. (crt,LaCombe, L) (Entered: 04/25/2016)
04/28/2016	<u>5</u>	CORPORATE DISCLOSURE STATEMENT by B P America Production Co identifying Corporate Parent B P P L C for B P America Production Co. (aty,Norman, Joe) Modified on 4/28/2016 to correct corporate parent name (Whidden, C). (Entered: 04/28/2016), (QC'ed on 04/28/2016, by Whidden , C)
04/28/2016	<u>6</u>	Ex Parte MOTION for Leave to Serve Summons and Complaint with consent by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # <u>1</u> Certificate

of No Opposition, # 2 Proposed order)(aty,Marcello, Victor) Modified text on 4/29/2016 (YocumSld, M). (Entered: 04/28/2016), (QC'ed on 04/29/2016, by YocumSld , M)

- 04/28/2016 7 CORPORATE DISCLOSURE STATEMENT by Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Texas Co identifying Corporate Parent Chevron Corp for Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Texas Co. (aty,Juneau, Claire) (Entered: 04/28/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 8 RESPONSE TO REMOVAL ORDER by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co . (Attachments: # 1 Exhibit A - Docs in State Court Record)(aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 9 CORPORATE DISCLOSURE STATEMENT by Shell Oil Co identifying Corporate Parent Royal Dutch Shell P L C for Shell Oil Co. (aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 10 CORPORATE DISCLOSURE STATEMENT by Shell Offshore Inc identifying Corporate Parent Shell Oil Co, Corporate Parent Shell U S E & P Investments L L C, Corporate Parent S O I Finance Inc, and Corporate Parent Royal Dutch Shell P L C for Shell Offshore Inc. (aty,Becker, Kelly) Modified text to include all corporate parent names on 4/29/2016 (YocumSld, M). (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 11 CORPORATE DISCLOSURE STATEMENT by Swepi L P identifying Corporate Parent Shell Oil Co, Corporate Parent Shell Energy Holding G P L L C, Corporate Parent Shell U S E & P Investments L L C for Swepi L P. (aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 05/03/2016 12 ELECTRONIC ORDER re 6 Motion for Leave to File Summons and Complaint. No leave of court is required for plaintiff to affect service and no action by plaintiff could serve as a waiver of any objection to subject matter jurisdiction as the defense is not waivable and cannot be conferred by consent. Accordingly the motion is DENIED. Signed by Magistrate Judge Kathleen Kay on 5/3/2016. (jud,Kay, Kathleen) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by LaCombe , L)
- 05/03/2016 REQUEST FOR ISSUANCE OF SUMMONS as to All Defendants, requested by Parish of Cameron. (aty,Marcello, Victor) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by YocumSld , M)
- 05/03/2016 13 CORPORATE DISCLOSURE STATEMENT by Exxon Mobil Corp. (aty,McNeal, Robert) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by YocumSld , M)
- 05/04/2016 14 SUMMONS ISSUED as to Apache Oil Corp, Auster Oil & Gas Inc, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Darsey Operating Corp, Enervest Operating L L C, Exxon Mobil Corp, Freeport Sulphur Co, Gulfport Energy Corp, Hilcorp Energy Co, Honeywell International Inc, Kerr-McGee Oil & Gas Onshore L P, Resource Securities Corp,

Samuel Gary Jr & Associates Inc, Shell Offshore Inc, Shell Oil Co, Star Energy Inc, Swepi L P, Taylor Energy Co L L C, Texas Co, Texas Pacific Oil Co Inc, Texas Petroleum Investment Co, Transcontinental Oil Corp, Vernon E Faulconer Inc (crt, YocumSld, M) (Entered: 05/04/2016)

- 05/10/2016 15 Joint MOTION FOR EXTENSION of Filing Deadlines and to Delay Rule 26 Requirements Pending Ruling on Remand Motion with consent by Parish of Cameron, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry), Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order)(aty,Becker, Kelly) Modified text and to add filer on 5/11/2016 (Dunford, T). (Entered: 05/10/2016), (QC'ed on 05/11/2016, by Bunting , M)
- 05/11/2016 16 ELECTRONIC ORDER re 15 Motion for Extension. The motion is denied without prejudice to the rights of movers to refile when and if a Motion to Remand is actually filed. Signed by Magistrate Judge Kathleen Kay on 5/11/2016. (jud,Kay, Kathleen) (Entered: 05/11/2016), (QC'ed on 05/12/2016, by LaCombe , L)
- 05/11/2016 17 CORPORATE DISCLOSURE STATEMENT by Freeport Sulphur Co identifying Corporate Parent Freeport McMoran Inc for Freeport Sulphur Co. (aty,Hainkel, Alida) (Entered: 05/11/2016), (QC'ed on 05/11/2016, by Bunting , M)
- 05/11/2016 18 MOTION to Remand by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum in Support of Motion to Remand, # 2 Proposed order)(aty,Marcello, Victor) (Entered: 05/11/2016), (QC'ed on 05/12/2016, by Bunting , M)
- 05/12/2016 19 NOTICE of Motion Setting regarding 18 MOTION to Remand. Motions referred to Kathleen Kay. (crt,Bunting, M) (Entered: 05/12/2016)
- 05/12/2016 20 Joint MOTION FOR EXTENSION of Filing Deadlines and Delay Rule 26 Requirements Pending Ruling on Remand Motion with consent by Parish of Cameron, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry), Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order)(aty,Becker, Kelly) Modified text and added filer on 5/13/2016 (YocumSld, M). (Entered: 05/12/2016), (QC'ed on 05/13/2016, by YocumSld , M)
- 05/16/2016 21 ELECTRONIC ORDER granting 20 Motion for Extension. IT IS ORDERED that, until ordered to do so by the Court after a final ruling on Plaintiffs motion to remand, no defendant shall be required to file responsive pleadings, the Federal Rule of Civil Procedure 26(f) conference in this proceeding shall be delayed, and the obligations of the parties under Federal Rule of Civil Procedure 26 shall be delayed. Signed by Magistrate Judge Kathleen Kay on 5/16/2016. (jud,Kay, Kathleen) Modified on 5/16/2016 to edit text (LaCombe, L). (Entered: 05/16/2016), (QC'ed on 05/16/2016, by LaCombe , L)

- 05/16/2016 22 MOTION for Extension of Time to File Response/Reply as to 18 MOTION to Remand with consent by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order) (aty,Becker, Kelly) (Entered: 05/16/2016), (QC'ed on 05/16/2016, by Putch , A)
- 05/17/2016 23 CORPORATE DISCLOSURE STATEMENT by Apache Corp. (aty,Longman, Douglas) (Entered: 05/17/2016), (QC'ed on 05/17/2016, by Reasor , M)
- 05/17/2016 24 ELECTRONIC ORDER granting 22 Motion for Extension of Time to File Response/Reply re 18 MOTION to Remand. Responses due by 6/8/2016. Signed by Magistrate Judge Kathleen Kay on 5/17/2016. (jud,Kay, Kathleen) (Entered: 05/17/2016), (QC'ed on 05/18/2016, by LaCombe , L)
- 05/18/2016 25 CORPORATE DISCLOSURE STATEMENT by Hilcorp Energy Co identifying Corporate Parent Hilcorp Energy Co for Hilcorp Energy Co. (aty,Isenberg, Craig) (Entered: 05/18/2016), (QC'ed on 05/18/2016, by Putch , A)
- 05/18/2016 26 CORPORATE DISCLOSURE STATEMENT by Enervest Operating L L C identifying Corporate Parent EnerVest, Ltd for Enervest Operating L L C. (aty,Zuckerman, Adam) (Entered: 05/18/2016), (QC'ed on 05/19/2016, by Putch , A)
- 05/23/2016 27 MOTION to Remand by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum / Brief, # 2 Proposed order)(aty,Jones, Steven) Modified on 5/24/2016 to edit text (Putch, A). (Entered: 05/23/2016), (QC'ed on 05/24/2016, by Putch , A)
- 05/23/2016 28 FILED IN ERROR CORPORATE DISCLOSURE STATEMENT by Texas Petroleum Investment Co. (aty,Guidry, Valerie) Modified on 5/23/2016 to indicate filed in error after received call from attorneys office re: wrong pdf (FinnSld, P). (Entered: 05/23/2016), (QC'ed on 05/23/2016, by FinnSld , P)
- 05/23/2016 29 CORPORATE DISCLOSURE STATEMENT by Texas Petroleum Investment Co. (aty,Guidry, Valerie) (Entered: 05/23/2016), (QC'ed on 05/24/2016, by Putch , A)
- 05/24/2016 30 NOTICE of Motion Setting regarding 27 MOTION to Remand . Motions referred to Kathleen Kay. (crt,Putch, A) (Entered: 05/24/2016)
- 05/24/2016 31 CORPORATE DISCLOSURE STATEMENT by Vernon E Faulconer Inc. (aty,Andrus, Alex) (Entered: 05/24/2016), (QC'ed on 05/26/2016, by Putch , A)
- 05/27/2016 32 CORPORATE DISCLOSURE STATEMENT by Taylor Energy Co L L C. (aty,Cook, Jonathan) (Entered: 05/27/2016), (QC'ed on 05/27/2016, by Putch , A)
- 06/08/2016 33 SUPPLEMENTAL NOTICE OF REMOVAL by Apache Corp (aty,Rodriguez, Carmen) Modified on 6/8/2016 to modify docket text (Whidden, C). Modified to modify docket text on 7/5/2016 (Thomas, T). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)

- 06/08/2016 [34](#) MEMORANDUM in Opposition re [27](#) MOTION to Remand *of the State of Louisiana* filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (aty,Becker, Kelly) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [35](#) MOTION to Request Oral Argument re [18](#) MOTION to Remand , [27](#) MOTION to Remand by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # [1](#) Proposed order)(aty,Becker, Kelly) Modified on 6/8/2016 to modify motion and docket text (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [36](#) MEMORANDUM in Opposition re [27](#) MOTION to Remand *by State of Louisiana* filed by Enervest Operating L L C. (aty,Degan, Nancy) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [37](#) CORPORATE DISCLOSURE STATEMENT by Honeywell International Inc. (aty,Kostal, Tyler) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [38](#) MEMORANDUM in Opposition re [18](#) MOTION to Remand filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (Attachments: # [1](#) Affidavit Declaration of Larry Lovas, # [2](#) Exhibit 1, # [3](#) Exhibit 2, # [4](#) Exhibit 3)(aty,Juneau, Claire) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [39](#) AFFIDAVIT OF BENJAMIN SCHLESINGER, Ph.D. re [38](#) Memorandum in Opposition to [18](#) Motion to Remand by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (Attachments: # [1](#) Exhibit A, # [2](#) Exhibit B, # [3](#) Exhibit C, # [4](#) Exhibit D, # [5](#) Exhibit E)(aty,Juneau, Claire) Modified on 6/8/2016 to modify docket text and to create docket entry relationship (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 [40](#) NOTICE TO THE COURT AND JOINDER IN MEMORANDUM in Opposition re [18](#) MOTION to Remand , [27](#) MOTION to Remand filed by Apache Corp. (aty,Rodriguez, Carmen) Modified on 6/9/2016 to modify docket text (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/09/2016, by Whidden , C)
- 06/10/2016 [41](#) MEMORANDUM in Opposition re [18](#) MOTION to Remand *by The Parish of Cameron* filed by Enervest Operating L L C. (aty,Degan, Nancy) (Entered: 06/10/2016), (QC'ed on 06/10/2016, by Whidden , C)
- 06/10/2016 [42](#) ELECTRONIC ORDER granting [35](#) Motion for Hearing Motion day set for 9/1/2016 at 01:30 PM in Lake Charles, Courtroom 3 before Magistrate Judge Kathleen Kay.. Signed by Magistrate Judge Kathleen Kay on 6/10/2016. (jud,Kay, Kathleen) (Entered: 06/10/2016), (QC'ed on 06/15/2016, by LaCombe , L)

- 06/10/2016 43 MOTION for Matthew T. Heartney to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3095563) by B P America Production Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit A Heartney Cert of good Standing, # 2 Proposed order)(aty,Norman, Joe) (Entered: 06/10/2016), (QC'ed on 06/13/2016, by Crick , S)
- 06/10/2016 44 MOTION for Nancy G. Milburn to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3095576) by B P America Production Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit A Milburn Cert of good Standing, # 2 Proposed order)(aty,Norman, Joe) Modified on 6/13/2016 to modify docket text (Crick, S). (Entered: 06/10/2016), (QC'ed on 06/13/2016, by Crick , S)
- 06/13/2016 45 ORDER granting 43 Motion to Appear Pro Hac Vice for appearance of Matthew T Heartney for B P America Production Co. Signed by Magistrate Judge Kathleen Kay on 06/13/16. (crt,Crick, S) (Entered: 06/14/2016), (QC'ed on 06/15/2016, by Whidden , C)
- 06/13/2016 46 ORDER granting 44 Motion to Appear Pro Hac Vice for appearance of Nancy G Milburn for B P America Production Co. Signed by Magistrate Judge Kathleen Kay on 06/13/16. (crt,Crick, S) (Entered: 06/14/2016), (QC'ed on 06/15/2016, by Whidden , C)
- 06/16/2016 47 REPLY to Response to Motion re 18 MOTION to Remand filed by Parish of Cameron. (Attachments: # 1 Exhibit A - Gagliano Affidavit, # 2 Exhibit B - Templett Affidavit, # 3 Exhibit C - Norman Affidavit)(aty,Marcello, Victor) (Entered: 06/16/2016), (QC'ed on 06/20/2016, by Dauterive , C)
- 06/20/2016 48 REPLY to Response to Motion re 27 MOTION to Remand filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Seidemann, Ryan) (Entered: 06/20/2016), (QC'ed on 06/20/2016, by Dauterive , C)
- 06/28/2016 49 NOTICE of Appearance by George H Robinson, Jr on behalf of Samuel Gary Jr & Associates Inc (Attorney George H Robinson, Jr added to party Samuel Gary Jr & Associates Inc(pty:dft)) (aty,Robinson, George) (Entered: 06/28/2016), (QC'ed on 06/29/2016, by Whidden , C)
- 06/29/2016 50 NOTICE of Corporate Disclosure Statement Requirement re: 49 Notice of Appearance, sent to George H Robinson, Jr on behalf of Samuel Gary Jr & Associates Inc. Corporate Disclosure Statement due by 7/13/2016. (crt,Whidden, C) (Entered: 06/29/2016)
- 07/01/2016 51 CORPORATE DISCLOSURE STATEMENT by Samuel Gary Jr & Associates Inc identifying Corporate Parent Gary Energy Corporation. (aty,Robinson, George) Modified to remove duplicate text on 7/1/2016 (Thomas, T). (Entered: 07/01/2016), (QC'ed on 07/01/2016, by Thomas , T)
- 07/01/2016 52 MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction* by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order, # 2 Memorandum in Support, # 3 Exhibit A - Affidavit of Claude Fike, # 4 Exhibit B - Part 1 of 2 - Environmental Impact Statement, # 5 Exhibit B - Part 2 of 2 -

Environmental Impact Statement)(aty,Marcello, Victor) (Entered: 07/01/2016), (QC'ed on 07/01/2016, by Thomas , T)

- 07/01/2016 [53](#) NOTICE of Motion Setting regarding [52](#) MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction*. Motions referred to Kathleen Kay. (crt,Thomas, T) (Entered: 07/01/2016)
- 07/01/2016 [54](#) MOTION to Remand regarding [33](#) Supplemental Notice of Removal by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # [1](#) Proposed order)(aty,Jones, Steven) Modified to reflect motion adopts document [52](#) , edit docket text and add document linkage on 7/5/2016 (Thomas, T). (Entered: 07/01/2016), (QC'ed on 07/05/2016, by Thomas , T)
- 07/05/2016 [55](#) NOTICE of Motion Setting regarding [54](#) MOTION to Remand . Motions referred to Kathleen Kay. (crt,Thomas, T) (Entered: 07/05/2016)
- 07/25/2016 [56](#) Opposition to [54](#) MOTION to Remand, [52](#) MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction filed by Apache Corp. (aty,Rodriguez, Carmen) Modified on 7/26/2016 to modify docket text (Crick, S). (Entered: 07/25/2016), (QC'ed on 07/26/2016, by Crick , S)
- 08/04/2016 [57](#) REPLY to Opposition Memorandum to [52](#) MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction, [54](#) MOTION to Remand filed by Parish of Cameron. (Attachments: # [1](#) Exhibit A - Supplemental Notice of Removal, # [2](#) Exhibit B - Affidavit of Claude Fike)(aty,Marcello, Victor) Modified on 8/5/2016 to modify docket text (Crick, S). (Entered: 08/04/2016), (QC'ed on 08/05/2016, by Crick , S)
- 08/04/2016 [58](#) REPLY MEMORANDUM IN SUPPORT of [54](#) MOTION to Remand adopting [57](#) Reply to Opposition Memorandum filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Jones, Steven) Modified on 8/5/2016 to modify docket text (Crick, S). (Entered: 08/04/2016), (QC'ed on 08/05/2016, by Crick , S)
- 08/25/2016 [59](#) MOTION for Ashley C Parrish to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3159218) by Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, and Texas Co. Motions referred to Kathleen Kay. (Attachments: # [1](#) Certificate of good standing, # [2](#) Proposed order)(aty,Mascari, Pamela) Modified on 8/25/2016 to modify motion and docket text, and to add filer (Whidden, C). (Entered: 08/25/2016), (QC'ed on 08/25/2016, by Whidden , C)
- 08/25/2016 ELECTRONIC ORDER: Given the pendency of Board of Commrs of the Southeast La. Flood Prot. Auth-East v. Tennessee Gas Pipeline Co., LLC, 29 F.Supp 3d 808 (E.D. La. 2014) before the U.S. Fifth Circuit Court of Appeals and its applicability to this proceeding, the hearing scheduled for September 1, 2016 at 1:30 p.m. is TERMINATED. Once the court of appeals has ruled we will allow the parties the opportunity to supplement or amend their memoranda, should they find supplementation or amendment warranted, and will proceed accordingly at that time.. Signed by Magistrate Judge Kathleen Kay on 8/25/2016. (crt,Solari, E)

(Entered: 08/25/2016), (QC'ed on 08/26/2016, by LaCombe , L)

- 08/30/2016 [60](#) ORDER granting [59](#) Motion to Appear Pro Hac Vice for appearance of Ashley C Parrish for Chevron Pipe Line Co, Ashley C Parrish for Chevron U S A Holdings Inc, Ashley C Parrish for Chevron U S A Inc, Ashley C Parrish for Texas Co. Signed by Magistrate Judge Kathleen Kay on 08/30/2016. (crt,Crick, S) (Entered: 08/30/2016)
- 09/14/2016 [61](#) MOTION for Donald W. Price to Enroll as Counsel by State of Louisiana. Motions referred to Kathleen Kay. (Attachments: # [1](#) Proposed order)(aty,Terrell, Megan) (Entered: 09/14/2016), (QC'ed on 09/15/2016, by Crick , S)
- 09/21/2016 [62](#) ORDER granting [61](#) Motion to Enroll as Counsel. Added as counsel Donald W Price for State of Louisiana. Signed by Magistrate Judge Kathleen Kay on 09/21/2016. (crt,Crick, S) (Entered: 09/22/2016)
- 03/08/2017 [63](#) ELECTRONIC ORDER: Considering the recent ruling by the Fifth Circuit Court of Appeals in the case of Board of Commrs of the Southeast La. Flood Prot. Auth-East v. Tennessee Gas Pipeline Co., LLC, et al, 2017 WL 874999 (5th Cir. Mar. 3, 2017), the court will allow the parties the opportunity to supplement or amend their memoranda to brief the applicability of that ruling to this proceeding. Plaintiff has 30 days or until April 7, 2017 to file a supplemental memorandum in support of its motion to remand. Defendant has 15 days from the filing of plaintiff's memorandum to file a response and plaintiff has 7 days from the filing of defendant's memorandum to file any reply. Signed by Magistrate Judge Kathleen Kay on 3/8/2017. (crt,Solari, E) (Entered: 03/08/2017), (QC'ed on 03/09/2017, by LaCombe , L)
- 03/08/2017 Set/Reset Deadlines: Compliance Deadline set for 4/7/2017. See Electronic Order [63](#) . (crt,LaCombe, L) (Entered: 03/09/2017)
- 04/07/2017 [64](#) SUPPLEMENTAL MEMORANDUM in Support Regarding the Effect of SLFPA Fifth Circuit Ruling re [18](#) MOTION to Remand, [52](#) MOTION to Remand Regarding Supplemental Removal Notice filed by Parish of Cameron. (aty,Marcello, Victor) Modified on 4/7/2017 to modify docket text. (Crick, S). (Entered: 04/07/2017), (QC'ed on 04/07/2017, by Crick , S)
- 04/07/2017 [65](#) SUPPLEMENTAL MEMORANDUM in Support re [27](#) MOTION to Remand filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Jones, Steven) (Entered: 04/07/2017), (QC'ed on 04/07/2017, by Crick , S)
- 04/21/2017 [66](#) SUPPLEMENTAL MEMORANDUM in Opposition re [18](#) MOTION to Remand, [27](#) MOTION to Remand *Regarding the Effect of the Fifth Circuit's Ruling in the Board of Commissioners Case per Doc 63* filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (aty,Becker, Kelly) (Entered: 04/21/2017), (QC'ed on 04/21/2017, by FinnSld , P)
- 04/24/2017 [67](#) SUPPLEMENTAL MEMORANDUM in Opposition re [54](#) MOTION to Remand, [52](#) MOTION to Remand *Regarding Supplemental Removal Notice* filed by Apache Corp. (Attachments: # [1](#) Exhibit)(aty,Rodriguez, Carmen) Modified on 4/25/2017 to

modify docket text. (Crick, S). (Entered: 04/24/2017), (QC'ed on 04/25/2017, by Crick , S)

- 04/27/2017 68 REPLY to Response to Motion re 18 MOTION to Remand *Regarding the Supplemental Briefing on the Effect of the Fifth Circuit's Ruling in the Board of Commissioners Case filed by BP America Production Company, Chevron Pipeline Company, Chevron USA Holdings Inc., Chevron USA Inc., Exxon Mobil Corporation, Shell Offshore, Inc., Shell Oil Company, SWEPI LP and The Texas Company* filed by Parish of Cameron. (aty,Marcello, Victor) (Entered: 04/27/2017), (QC'ed on 04/27/2017, by FinnSld , P)
- 04/28/2017 69 REPLY to Response to Motion re 18 MOTION to Remand *Regarding the Applicability of the Fifth Circuit's Ruling in Board of Commissioners filed by Apache* filed by Parish of Cameron. (aty,Marcello, Victor) (Entered: 04/28/2017), (QC'ed on 05/01/2017, by FinnSld , P)
- 06/05/2017 70 DEFICIENT NOTICE of Appearance by Joshua A Norris on behalf of Gulfport Energy Corp (Attorney Joshua A Norris added to party Gulfport Energy Corp(pty:dft)) (aty,Norris, Joshua) Modified on 6/6/2017 to indicate deficient status. (Crick, S). Modified on 6/8/2017 indicate 76 Notice of Appearance resubmitted in its entirety. (Crick, S). (Entered: 06/05/2017), (QC'ed on 06/06/2017, by Crick , S)
- 06/05/2017 71 DEFICIENT NOTICE of Appearance by William D Lampton on behalf of Gulfport Energy Corp (Attorney William D Lampton added to party Gulfport Energy Corp(pty:dft)) (aty,Lampton, William) Modified on 6/6/2017 to indicate deficient status. (Crick, S). Modified on 6/8/2017 to indicate 74 Notice of Appearance resubmitted in its entirety.(Crick, S). (Entered: 06/05/2017), (QC'ed on 06/06/2017, by Crick , S)
- 06/06/2017 72 NOTICE of Deficiency to Joshua A Norris on behalf of Gulfport Energy Corp regarding 70 Notice of Appearance. Reason: Signature of attorney is required. (crt,Crick, S) (Entered: 06/06/2017)
- 06/06/2017 73 NOTICE of Deficiency to William D Lampton on behalf of Gulfport Energy Corp regarding 71 Notice of Appearance. Reason: Signature of attorney is required. (crt,Crick, S) (Entered: 06/06/2017)
- 06/08/2017 74 Notice of Appearance of Counsel as to William D Lampton filed by Gulfport Energy Corp regarding 71 Notice of Appearance. (aty,Lampton, William) Modified on 6/8/2017 to modify docket text. (Crick, S). (Entered: 06/08/2017), (QC'ed on 06/08/2017, by Crick , S)
- 06/08/2017 75 NOTICE of Appearance by William Thomas McCall, Jr on behalf of Gulfport Energy Corp (Attorney William Thomas McCall, Jr added to party Gulfport Energy Corp(pty:dft)) (aty,McCall, William) (Entered: 06/08/2017), (QC'ed on 06/08/2017, by Crick . S)
- 06/08/2017 76 Notice of Appearance of Counsel as to Joshua A Norris filed by Gulfport Energy Corp regarding 70 Notice of Appearance. (aty,Norris, Joshua) Modified on 6/8/2017 to modify docket text. (Crick, S). (Entered: 06/08/2017), (QC'ed on 06/08/2017, by

Crick , S)

- 06/10/2017 77 MOTION to Withdraw Steven B Jones as Counsel by State of Louisiana (Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Jones, Steven) Modified on 6/12/2017 to modify docket text. (Crick, S). (Entered: 06/10/2017), (QC'ed on 06/12/2017, by Crick , S)
- 06/13/2017 78 ELECTRONIC ORDER granting 77 Motion to Withdraw as Attorney. Attorney Steven B Jones terminated as counsel for State of Louisiana (Ex Rel Jeff Landry). Signed by Magistrate Judge Kathleen Kay on 6/13/2017. (jud,Kay, Kathleen) (Entered: 06/13/2017), (QC'ed on 06/14/2017, by LaCombe , L)
- 07/11/2017 79 MOTION for Leave to File Notice of Supplemental Authorities with consent by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed Notice of Supplemental Authorities, # 2 Proposed Exhibit A - Report & Recommendation, # 3 Proposed Exhibit B - Order and Reasons, # 4 Proposed order)(aty,Marcello, Victor) Modified on 7/11/2017 to modify docket text. (Crick, S). (Entered: 07/11/2017), (QC'ed on 07/11/2017, by Crick , S)
- 07/12/2017 80 ELECTRONIC ORDER granting 79 Motion for Leave to File Notice of Supplemental Authorities. Signed by Magistrate Judge Kathleen Kay on 7/12/2017. (jud,Kay, Kathleen) (Entered: 07/12/2017), (QC'ed on 07/14/2017, by LaCombe , L)
- 07/12/2017 81 NOTICE of Supplemental Authorities by Parish of Cameron (Attachments: # 1 Exhibit A, # 2 Exhibit B)(crt,Crick, S) Modified on 7/14/2017 to modify date of filing. (Crick, S). (Entered: 07/14/2017)
- 07/28/2017 82 MOTION to Schedule Oral Argument, and in the Alternative, Motion for Ruling re 18 MOTION to Remand and 27 MOTION to Remand by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum / Brief, # 2 Proposed order)(aty,Marcello, Victor) Modified on 7/31/2017 to edit text (Reeves, T). (Entered: 07/28/2017), (QC'ed on 07/31/2017, by Reeves , T)
- 08/09/2017 83 ELECTRONIC MINUTE ENTRY issued by the Clerk. Case reassigned to Unassigned District Judge. Judge Patricia Minaldi no longer assigned to case. All pending motions are referred to Magistrate Judge Kathleen Kay for processing. All deadlines and hearings remain as set pending further review by the court. All future filings should bear the name of the new judge assignment. Approved by Chief Judge Dee D Drell on 8/7/2017. (crt,FinnSld, P) (Entered: 08/09/2017)
- 08/17/2017 84 MOTION for Leave to File Notice of Supplemental Authority with consent by Parish of Cameron. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed Notice of Supplemental Authority, # 2 Proposed order, # 3 Exhibit)(aty,Marcello, Victor) Modified on 8/17/2017 to edit text (FinnSld, P). (Entered: 08/17/2017), (QC'ed on 08/17/2017, by FinnSld , P)
- 10/26/2017 85 MOTION for Status Conference by Parish of Cameron. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Bruchhaus, David) (Entered: 10/26/2017), (QC'ed on 10/26/2017, by Crick , S)

- 11/14/2017 86 NOTICE by Parish of Cameron of Letter to Chief Judge S. Maurice Hicks, Jr (aty,Marcello, Victor) (Entered: 11/14/2017), (QC'ed on 11/15/2017, by Crick , S)
- 12/04/2017 87 ORDER granting (85) Motion for Status Conference in case 2:16-cv-00530-UDJ-KK; granting (120) Motion for Status Conference in case 2:16-cv-00531-UDJ-KK; granting (70) Motion for Status Conference in case 2:16-cv-00532-UDJ-KK; granting (63) Motion for Status Conference in case 2:16-cv-00535-UDJ-KK; granting (89) Motion for Status Conference in case 2:16-cv-00536-UDJ-KK; granting (54) Motion for Status Conference in case 2:16-cv-00537-UDJ-KK; granting (77) Motion for Status Conference in case 2:16-cv-00538-UDJ-KK; granting (69) Motion for Status Conference in case 2:16-cv-00539-UDJ-KK; granting (63) Motion for Status Conference in case 2:16-cv-00540-UDJ-KK; granting (48) Motion for Status Conference in case 2:16-cv-00541-UDJ-KK; granting (61) Motion for Status Conference in case 2:16-cv-00542-UDJ-KK. District Judge Status Conference set for 12/6/2017 10:00 AM by telephone before Chief Judge S Maurice Hicks Jr. Counsel shall use the following information to call into the status conference: 1-877-848-7030, Access Code 4212407. Lead Counsel for Plaintiff, Cameron Parish, shall identify all counsel who will participate in the status conference and supply a list of counsel participating to the Court via email (motions_hicks@lawd.uscourts.gov) no later than 3:00 p.m. on December 5, 2017. Signed by Chief Judge S Maurice Hicks, Jr on 12/4/2017. (crt,Crick, S) (Entered: 12/04/2017)
- 12/04/2017 Set Status Conference: District Judge Status Conference set for 12/6/2017 10:00 AM by telephone before Chief Judge S Maurice Hicks Jr. (crt,Crick, S) (Entered: 12/04/2017)
- 12/04/2017 Set Deadlines: Deadline to submit list of counsel participating in status conference on 12/6/2017 before Judge Hicks set for 12/5/2017 at 3:00 p.m. (crt,Crick, S) (Entered: 12/04/2017)
- 12/06/2017 88 MINUTES for proceedings held before Chief Judge S Maurice Hicks, Jr: STATUS CONFERENCE held on 12/6/2017, denying 86 expedited consideration of pending motions to remand. (crt,McDonnell, D) (Entered: 12/07/2017)
- 01/17/2018 89 REPORT AND RECOMMENDATIONS: IT IS RECOMMENDED that the Motions to Remand, 18 MOTION to Remand filed by Parish of Cameron, 27 MOTION to Remand filed by State of Louisiana, 52 MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction filed by Parish of Cameron and 54 MOTION to Remand filed by State of Louisiana, are GRANTED and that the matter be remanded to the 38th Judicial District Court, Cameron Parish, Louisiana. IT IS ALSO RECOMMENDED that 82 MOTION to Schedule Oral Argument and in the Alternative, Motion for Ruling re 18 MOTION to Remand 27 MOTION to Remand filed by Parish of Cameron; 84 MOTION for Leave to File Notice of Supplemental Authority with consent filed by Parish of Cameron; and 85 Motion for Status Conference be DENIED AS MOOT. Objections to R&R due by 1/31/2018. Signed by Magistrate Judge Kathleen Kay on 1/17/2018. (crt,LaCombe, L) (Entered: 01/18/2018)

- 01/31/2018 90 OBJECTION to 89 Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Response to Objection to R&R due by 2/14/2018 (Attachments: # 1 Memorandum/Brief)(aty,Marcello, Victor) Modified on 2/1/2018 to modify docket text. (Crick, S). (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 91 OBJECTION to 89 Report and Recommendations by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Response to Objection to R&R due by 2/14/2018 (Attachments: # 1 Memorandum / Brief, # 2 Exhibit A)(aty,Becker, Kelly) Modified on 2/1/2018 to modify docket text. (Crick, S). Modified on 2/9/2018 to indicate 96 Notice of Supplemental Authority filed. (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 92 Objections to 89 REPORT AND RECOMMENDATIONS filed by Enervest Operating L L C . (aty,Degan, Nancy) Modified on 2/1/2018 to more accurately describe document. (Crick, S). (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 92 OBJECTION to 89 Report and Recommendations by Enervest Operating L L C. Response to Objection to R&R due by 2/14/2018. ADMINISTRATIVE ENTRY as this document was electronically filed in error as 92 Response. (crt,Crick, S) Modified on 2/1/2018 to modify docket text and add document number. (Crick, S). (Entered: 02/01/2018)
- 02/01/2018 93 OBJECTION to 89 REPORT AND RECOMMENDATIONS by Apache Corp. (Attachments: # 1 Exhibit, # 2 Memorandum / Brief)(aty,Rodriguez, Carmen) Modified on 2/2/2018 to more accurately describe document. (Crick, S). (Entered: 02/01/2018), (QC'ed on 02/02/2018, by Crick , S)
- 02/01/2018 93 OBJECTION to 89 Report and Recommendations by Apache Corp. Response to Objection to R&R due by 2/15/2018. ADMINISTRATIVE ENTRY as this document was electronically filed in error as 93 Response. (crt,Crick, S) Modified on 2/2/2018 to modify docket text and add document number. (Crick, S). (Entered: 02/02/2018)
- 02/06/2018 94 Unopposed MOTION for Leave to File Notice of Supplemental Authority re 91 Objections to 89 Report & Recommendation by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed pleading, # 2 Proposed order) Modified on 2/6/2018 to modify docket text, create docket entry relationship and capture appropriate motion event. (Crick, S). (Entered: 02/06/2018), (QC'ed on 02/06/2018, by Crick , S)
- 02/07/2018 95 ELECTRONIC ORDER granting 94 Motion for Leave to File Notice of Supplemental Authority. Signed by Magistrate Judge Kathleen Kay on 2/7/2018. (jud,Kay, Kathleen) (Entered: 02/07/2018), (QC'ed on 02/09/2018, by LaCombe , L)

- 02/07/2018 [96](#) NOTICE of Supplemental Authority re [91](#) Objections to [89](#) Report and Recommendation by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (crt,Crick, S) Mo (Entered: 02/09/2018)
- 02/14/2018 [97](#) RESPONSE TO OBJECTION to [89](#) Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (Attachments: # [1](#) Exhibit A - List of Eastern District Suits, # [2](#) Exhibit B - Cases Denying Removal Into Admiralty)(aty,Marcello, Victor) Modified on 2/14/2018 to modify docket text. (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/14/2018, by Crick , S)
- 02/14/2018 [98](#) RESPONSE TO OBJECTION by Apache Corp to [89](#) Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Marcello, Victor) Modified on 2/15/2018 to modify docket text. (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/15/2018, by Crick , S)
- 02/14/2018 [99](#) RESPONSE to Objection by Plaintiffs and Intervenors to [89](#) Report and Recommendations by Apache Corp. (Attachments: # [1](#) Exhibit)(aty,Rodriguez, Carmen) Modified on 2/15/2018 (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/15/2018, by Crick , S)
- 02/14/2018 [99](#) RESPONSE TO OBJECTION by Plaintiffs and Intervenors to [89](#) Report and Recommendations by Apache Corp. ADMINISTRATIVE ENTRY as document was electronically filed in error as 99 Response. (crt,Crick, S) Modified on 2/15/2018 to add document number. (Crick, S). (Entered: 02/15/2018)
- 05/07/2018 [100](#) ELECTRONIC MINUTE ENTRY issued by the Clerk. Case reassigned to Judge Terry A. Doughty. All motions previously pending are transferred to Judge Doughty. All deadlines and hearings remain as set pending further review by the court. All future filings should bear the name of the new judge assignment. Approved by Chief Judge S Maurice Hicks, Jr on 5/7/2018.(crt,Reasor, M) (Entered: 05/07/2018)
- 05/09/2018 [101](#) MEMORANDUM RULING re [89](#) REPORT AND RECOMMENDATION of the Magistrate Judge re [18](#) MOTION to Remand filed by Parish of Cameron, [27](#) MOTION to Remand filed by Parish of Cameron, [52](#) MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction* filed by Parish of Cameron, and [54](#) MOTION to Remand filed by State of Louisiana. Signed by Judge Terry A Doughty on 5/9/2018. (crt,Crawford, A) (Entered: 05/09/2018)
- 05/09/2018 [102](#) JUDGMENT re [89](#) Report and Recommendation of the Magistrate Judge. It is Ordered that [18](#), [27](#), [52](#), and [54](#) Motions and Supplemental Motions to Remand are Granted. This matter is remanded to the 38th Judicial District Court, Cameron Parish, Louisiana. It Is Further Ordered that [82](#) Motion for Oral Argument, [84](#) Motion for Leave to File Notice of Supplemental Authority and [85](#) Motion for Status Conference are Denied As Moot. Signed by Judge Terry A Doughty on 5/9/2018. (crt,Crawford, A) (Entered: 05/09/2018)

RECEIVED & FILED
2018 MAY 14 A 10:23
CLERK OF COURT
CAMERON PARISH, LA.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

PARISH OF CAMERON, ET AL.

CIVIL ACTION NO. 16-1530

VERSUS

JUDGE TERRY A. DOUGHTY

AUSTER OIL & GAS, INC., ET AL.

MAG. JUDGE KATHLEEN KAY

JUDGMENT

For the reasons set forth in the Report and Recommendation of the Magistrate Judge [Doc. No. 98], to the extent adopted by this Court after a *de novo* review of the entire record, including the objections and responses, and for those additional reasons set forth in this Court's Ruling,

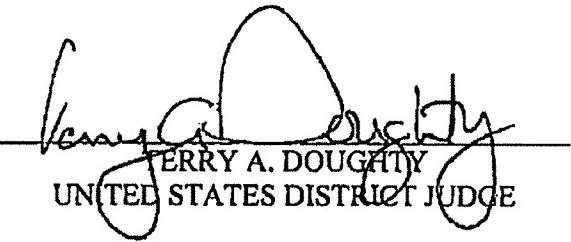
IT IS ORDERED that the Motions and Supplemental Motions to Remand [Doc. Nos. 18, 27, 52 & 54] filed by Plaintiff Parish of Cameron and Intervenor the State of Louisiana *ex rel.* Jeff Landry, Attorney General and through the Louisiana Department of Natural Resources, Office of Costal Management, and Louisiana Department of Natural Resources, Thomas F. Harris are GRANTED. The Clerk of Court is hereby instructed to remand this matter to the 38th Judicial District Court, Cameron Parish, Louisiana, forthwith.

IT IS FURTHER ORDERED that the related Motion for Oral Argument [Doc. No. 82], Motion for Leave to File Notice of Supplemental Authority [Doc. No. 84], and Motion for Status

Conference [Doc. No. 85] as DENIED AS MOOT.

MONROE, LOUISIANA, this 9th day of May, 2018.




TERRY A. DOUGHTY
UNITED STATES DISTRICT JUDGE

WALL, BULLINGTON & COOK, LLC

ATTORNEYS

540 ELMWOOD PARK BLVD.

NEW ORLEANS, LA 70123

504 736 0347

504 734 8574 FAX

lgilthorpe@wallbulling.com

May 17, 2018

Ref: 0745

VIA US MAIL

Clerk of Court

Cameron Parish

P.O. Box 549

Cameron, LA 70631

FAX FILED:
May 17, 2018
B. Savoie
Deputy Clerk of Court

RECEIVED & FILED
2018 MAY 21 P 1:1b
CLERK OF COURT
CAMERON PARISH, LA.

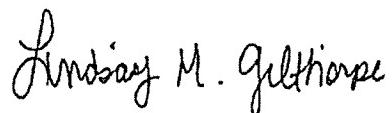
Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*,
Docket no. 10-19582, 38th JDC, Cameron Parish, Louisiana

Dear Clerk,

Enclosed find one original and one copy of Taylor Energy Company, LLC's Request for Notice, which was fax filed. Please file the original and return a conformed copy in the envelope provided. Also enclosed is a check for \$47.00 to cover your fees. If you have any questions, please do not hesitate to contact our office.

Thanking you in advance for your help, I remain,

Sincerely,



Lindsay M. Gilthorpe
Legal Assistant

Enclosures

RECEIVED & FILED
2018 MAY 21 P 1:16
CLERK OF COURT
CAMERON PARISH, LA.

38th JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

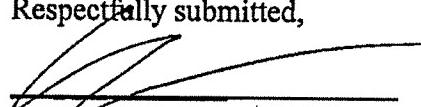
THE PARISH OF CAMERON FAX FILED:
May 17, 2018
VERSUS D. Savoie
Deputy Clerk of Court
AUSTER OIL AND GAS, INC., ET AL.

FILED: _____
DEPUTY CLERK OF COURT

REQUEST FOR WRITTEN NOTICE

Pursuant to Article 1571 and 1572 of the Louisiana Code of Civil Procedure, undersigned counsel for defendant, Taylor Energy Company, LLC, hereby requests written notice of all hearings, trials, orders, judgments, interlocutory decrees, and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in the Louisiana Code of Civil Procedure, particularly, but not limited to articles 1912-1917.

Respectfully submitted,


Guy E. Wall, T.A. (#7718)
Jonathan R. Cook (#25629)
Sara Lewis (#32558)
Maurine Wall Laborde (#34139)
Wall, Bullington & Cook, LLC
540 Elmwood Park Blvd
New Orleans, Louisiana 70123
Telephone: (504) 736-0347
Fax: (504) 734-8574

Attorneys for Taylor Energy Company, LLC

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that a copy of the above and foregoing has been served on all counsel by electronic means on this 17 of May, 2018.



SUSAN RACCA
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court

Vs No: 10 - 19582 : Parish of Cameron

Auster Oil & Gas Inc et al : State of Louisiana

Dear Mr. Wall,

I hereby acknowledge receipt of your Request for written notice

for filing on this 17th day of May, 2018 Within 7

days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$ 47.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE

Deputy Clerk of Court

504 - 734 - 8544

WALL, BULLINGTON & COOK, LLC

ATTORNEYS

540 ELMWOOD PARK BLVD.
NEW ORLEANS, LA 70123
(504) 736-0347
FAX: (504) 734-8574

FAX TRANSMISSION

CONFIDENTIALITY NOTICE: This facsimile transmission (along with any documents accompanying it) is intended only for the person(s) to whom it is addressed and may contain confidential, privileged information. If you are not the intended recipient, you are notified that any disclosure, copying, or distributing of or taking any action in reliance on the contents of this information is strictly prohibited. Please call us immediately if the transmission you have received is incomplete, illegible, or has been received by you in error.

MATTER: **0745**

TO: **Clerk of Court**

FAX NO. **(337) 775-7172**

FROM: **Lindsay Gilthorpe**

DATE: **May 16, 2018**

No. of pages (including this page): **3**

MESSAGE:

Sent by: Lindsay

WALL, BULLINGTON & COOK, LLC

ATTORNEYS

540 ELMWOOD PARK BLVD.

NEW ORLEANS, LA 70123

504 736 0347

504 734 8574 FAX

lgilthorpe@wallbulling.com

May 16, 2018

Ref: 0745

VIA FAX (337) 775-7172

Clerk of Court
Cameron Parish
P.O. Box 549
Cameron, LA 70631

RECEIVED & FILED
2018 MAY 17 A 10:23
CLERK OF COURT
CAMERON PARISH, LA.

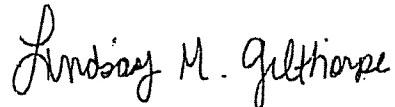
Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*,
Docket no. 10-19582, 38th JDC, Cameron Parish, Louisiana

Dear Clerk,

Enclosed find Taylor Energy Company, LLC's Request for Notice, which is being fax filed. Please file with today's date. The original and any fee required will follow by mail. If you have any questions, please do not hesitate to contact our office.

Thanking you in advance for your help, I remain,

Sincerely,



Lindsay M. Gilthorpe
Legal Assistant

Enclosures

cc: All counsel of Record (via email)

38th JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

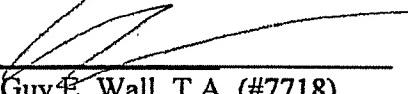
FILED: _____

DEPUTY CLERK OF COURT

REQUEST FOR WRITTEN NOTICE

Pursuant to Article 1571 and 1572 of the Louisiana Code of Civil Procedure, undersigned counsel for defendant, Taylor Energy Company, LLC, hereby requests written notice of all hearings, trials, orders, judgments, interlocutory decrees, and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in the Louisiana Code of Civil Procedure, particularly, but not limited to articles 1912-1917.

Respectfully submitted,


Guy E. Wall, T.A. (#7718)
Jonathan R. Cook (#25629)
Sara Lewis (#32558)
Maurine Wall Laborde (#34139)
Wall, Bullington & Cook, LLC
540 Elmwood Park Blvd
New Orleans, Louisiana 70123
Telephone: (504) 736-0347
Fax: (504) 734-8574

Attorneys for Taylor Energy Company, LLC

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that a copy of the above and foregoing has been served on all counsel by electronic means on this 16 of May, 2018.



RECEIVED & FILED
2018 MAY 17 A 10:23

CLERK OF COURT
CAMERON PARISH, LA.

1054

TIME : 05-17-2018 10:36
FAX NO.1 :
NAME :

FILE NO. : 813
DATE : 05.17 10:35
TO : 15047348574-3400
DOCUMENT PAGES : 2
START TIME : 05.17 10:35
END TIME : 05.17 10:36
PAGES SENT : 2
STATUS : OK

SUCCESSFUL TX NOTICE

SUSAN RACCA
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38th Judicial District Court
Vs No: 10 - 10582 : Parish of Cameron
Austin Oil & Gasoline et al : State of Louisiana
Dear Mr. Wall

I hereby acknowledge receipt of your Request for written notice

for filing on this 17th day of May, 2018 May 17, 2018

100% messages received by fax machine, and all messages sent by fax machine are considered delivered to the addressee.

(1) The original signed document.

(2) Filing fee of \$ 47.00 of which will include a \$5.00 transmission fee and fax charges.

(3) SUIT HAS ENOUGH MONEY TO COVER COST
Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

504 - 734 - 8574

GUGLIELMO, LOPEZ, TUTTLE, HUNTER & JARRELL, L.L.P.

ATTORNEYS AT LAW
POST OFFICE DRAWER 1329
306 E. NORTH STREET (70570)
OPELOUSAS, LOUISIANA 70571-1329
PHONE: (337) 948-8201 FAX: (337) 942-4521
WWW.GLTHJ.COM

JAMES C. LOPEZ
GINA BRADLEY TUTTLE
H. DOUGLAS HUNTER
CHARLES M. JARRELL

JAMES T. GUGLIELMO
(1937-2018)
CJARRELL@GLTHJ.COM

May 15, 2018

Hon. Susan Racca
Clerk of Court, Cameron Parish
38th Judicial District Court
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron
VS. Auster Oil and Gas, Inc., et al
Docket No. 10,19582

RECEIVED & FILED
2018 MAY 18 A 10:05
CLERK OF COURT
CAMERON PARISH, LA.

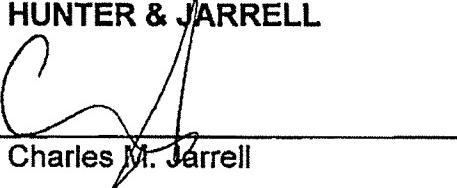
Dear Ms. Racca:

Enclosed please find a Request for Notice of Trial, Notice of Judgment, and Notice of Representation which I ask be filed of record on behalf of Vernon E. Faulconer, Inc. Our check in the amount of \$50.00 is enclosed to cover the cost of filing.

With best wishes, I am,

Sincerely yours,

**GUGLIELMO, LOPEZ, TUTTLE,
HUNTER & JARRELL**

BY: 

Charles M. Jarrell

CMJ:dal

cc: All Known Counsel of Record (via email)
1081.400

THE PARISH OF CAMERON
VERSUS

AUSTER OIL AND GAS, INC., ET AL

RECEIVED DOCKET NO. 10-19582

2018 MAY 18TH JUDICIAL DISTRICT COURT

CLERK OF COURT

CAMERON PARISH, LOUISIANA

**REQUEST FOR NOTICE OF TRIAL, NOTICE OF JUDGMENT,
AND NOTICE OF REPRESENTATION**

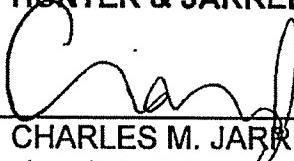
TO: CLERK OF COURT
PARISH OF CAMERON

Please be advised that undersigned counsel will represent defendant,
VERNON E. FAULCONER, INC., and do hereby request that written notice be mailed to
undersigned counsel by the Clerk, by certified mail, properly stamped and addressed, at
least ten (10) days before the date fixed for the trial on the merits hereof, or any hearing
on any other matter herein, all in accordance with La. C.C.P. art. 1572.

It is further requested that the undersigned be sent notice of the rendition and
signing of all final judgments and interlocutory orders or judgments pursuant to La.
C.C.P. articles 1913 and 1914.

BY ATTORNEYS:

GUGLIELMO, LOPEZ, TUTTLE,
HUNTER & JARRELL

BY: 

CHARLES M. JARRELL, #17638
cjarrell@glthj.com

GINA BRADLEY TUTTLE, #12966
gtuttle@glthj.com

306 E. North Street
Post Office Drawer 1329
Opelousas, Louisiana 70571
Phone: (337) 948-8201
Fax: (337) 942-4521

Attorneys for VERNON E. FAULCONER, INC.

RECEIVED
2018 MAY 18 & FILED
CLERK OF COURT
CAMERON PARISH, LA

THE PARISH OF CAMERON
VERSUS
AUSTER OIL AND GAS, INC., ET AL

DOCKET NO. 10-19582
38TH JUDICIAL DISTRICT COURT
CAMERON PARISH, LOUISIANA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been forwarded to the following counsel of record by electronic mail and/or by placing same in the United States mail, postage prepaid, and properly addressed.

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Attorneys for Shell Offshore, Inc., Shell Oil Company, and SWEPI, LP

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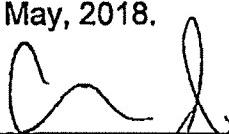
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